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ABSTRACT

In the context of the debate about quality and its assurance and assessment in higher education, a study was undertaken of professional regulatory bodies (PRBs), and their involvement in British higher education. The study involved a survey of 92 professional and regulatory bodies, in-depth interviews with group representatives, discussions at a seminar, and a review of the literature. The research revealed that: (1) PRBs are varied in organization, scope, power and involvement in their field, which is reflected in a wide range of types of involvement in higher education; (2) the professional-client relationship is one of a power imbalance brought about by the professional's knowledge and ability and the client's needs (although professional values supposedly proscribe the exploitation of this relationship); (3) the professional body is entrusted with ensuring the public interest in the absence of any effective checks on the activities of the professional through the operation of the market; and (4) although professional bodies vary enormously in their requirements, there is a broad tendency among many professions for a distinction between initial education and professional training. The study also led to a series of recommendations such as that professional bodies should define the specific competencies and underpinning knowledge required of their practitioners and the trend toward indirect monitoring of standards should be encouraged. Appendixes contain additional tables of data, information on methodology, and a model of external quality monitoring. (Contains 75 references.) (JB)

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ED 390 334

QUALITY IN HIGHER EDUCATION PROJECT

THE ROLE OF PROFESSIONAL BODIES IN HIGHER EDUCATION QUALITY MONITORING

Lee Harvey and Selena Mason

with Rowen Ward

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The Role of Professional Bodies in Higher Education Quality Monitoring

QHE

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The *QHE* project was launched in September 1991. It is sponsored by a partnership of education, government and business. Its sponsors include the Department for Education, the funding councils, accrediting bodies, major employers, employers' organisations, higher education institutions and research and training organisations. It is independent of any single organisation or institution but its physical base is the Centre for Research into Quality at The University of Central England in Birmingham.

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The Role of Professional Bodies in Higher Education Quality Monitoring

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with Rowen Ward

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GLOSSARY

ACCA	The Chartered Association of Certified Accountants
CCETSW	Central Council for Education and Training in Social Work
CEC	Commission of European Communities
CIB	The Chartered Institute of Bankers
CIH	Chartered Institute of Housing
CNAA	Council for National Academic Awards
CPD	Continuing Professional Development
CPE	Continuing Professional Education
CPE(Law)	Common Professional Examination (Law)
CSLT	College of Speech and Language Therapists
CSD	Chartered Society of Designers
DABCE	Degree Accreditation Board for Chartered Engineers
ECBA	European Community's Biologist Association
FE	Further Education
GAGTL	Gemmological Association and Gem Testing Laboratory of Great Britain
GDC	General Dental Council
GMC	General Medical Council
GTCS	General Teaching Council for Scotland
HE	Higher Education
HEFCE	Higher Education Funding Council for England
HEFCW	Higher Education Funding Council for Wales
HEFCs	Higher Education Funding Councils
HEI	Higher Education Institution
HEQC	Higher Education Quality Council
HMO	Health Maintenance Organisation
IChemE	Institution of Chemical Engineers
ICSA	Institute of Chartered Secretaries and Administrators
IoB	Institute of Biology
IEE	Institution of Electrical Engineers
ITT	Initial Teacher Training
LA	The Library Association
LS	The Law Society
NARIC	National Academic Recognition Information Centres
NAFTA	North American Free Trade Area
NBNMHVS	National Board for Nursing, Midwifery and Health Visiting for Scotland.
NCVQ	National Council for Vocational Qualifications
NVQ	National Vocational Qualification
OFSTED	Office for Standards in Education
PRBs	Professional and Regulatory Bodies
PREP	Post-Registration Education and Practice
REHIS	Royal Environmental Health Institute of Scotland
RIBA	Royal Institute of British Architects
PSBs	Professional and Statutory Bodies
RIPHH	Royal Institute of Public Health and Hygiene
RCM	The Royal College of Midwives Trust
RCVS	Royal College of Veterinary Surgeons
RSC	Royal Society of Chemistry
RTPI	The Royal Town Planning Institute
SHEFC	Scottish Higher Education Funding Council
SVQ	Scottish Vocational Qualification
SMEs	Small and Medium Enterprises
TTA	The Teacher Training Agency
UKCC	United Kingdom Central Council for Nursing, Midwifery and Health Visiting
UKU	Underpinning Knowledge and Understanding

EXECUTIVE SUMMARY

Introduction

Professional education and training is an important aspect of post-compulsory educational provision in Britain. Professional and regulatory bodies (PRBs) have a role in specifying the nature of the education and training required for entry to the profession; assessing required knowledge, competence and values; ensuring the suitability of providers of professional education and training and specifying continuous professional development. The research undertaken by *QHE* revealed that:

- PRBs are extremely varied in organisation, scope, power and involvement in their field, which is reflected in a wide range of types of involvement in higher education;
- the professional-client relationship is one of a power imbalance brought about by the professional's knowledge and ability and the client's needs;
- the professional body is entrusted with ensuring the public interest in the absence of any effective checks on the activities of the professional through the operation of the market;
- although professional bodies vary enormously in the requirements they place on entry to the profession, there is a broad tendency among many professions for a distinction between initial education and professional training.

Interests

Analysis of the nature, role and functioning of professional bodies revolves around a core dilemma: are professional bodies a means to safeguard the interests of the public, the professional practitioners, or the professional body itself? In resolving this dilemma there are three central issues common to all professional organisations that must be taken into account.

- The professional title is the guarantee of competence, which requires rules of conduct, disciplinary sanctions and a system of education and training that will produce the competence to which the title attests.
- The delegation of control of the profession to the professional body, often via statute, ensures that they have considerable power and autonomy. This is claimed to be necessary to ensure effective control over members and adaptation of requirements for education and training in light of changed social, economic and cultural circumstances.
- With the growth of consumerism, doubt is cast on the centrality of the professional-client relationship as a legitimation for professional power and privilege. Furthermore, it is perhaps not the 'esoteric' knowledge of professionals that gives them their power but the organisation of the profession.

In the last resort, the self-interest of professions is served by safeguarding the public interest. It is easier to retain power and privilege if the public perception of the service provided is positive. Claiming to safeguard the public interest provides a legitimation for exclusivity of practice, prestige and privilege.

Course Content

Professional and regulatory bodies are concerned with the content of both initial and professional education and training. They need to satisfy themselves that the programme of study equips successful students with the knowledge and ability to progress into the profession. With regard to curriculum development, the research found common features amongst the variety of approaches taken by PRBs.

- Professional bodies tend to be more prescriptive about the content of the professional level than of initial education. However, there is a tendency for professional bodies to adopt a more flexible approach to course content at all levels.
- Some professional bodies are committed to curriculum development. This ranges from periodic review, through incremental change to local variations on a national curriculum. A major issue is the ever-expanding syllabus.
- The *QHE* research suggests that PRB involvement in the curriculum is not so much geared towards maintaining the 'mysteries' of esoteric knowledge but in developing effective reflective practitioners.

There are various approaches to specifying syllabus content. In some cases the professional body 'own' the syllabus or provide a model syllabus. However, many PRBs do not specify a syllabus but indicate the type of content or outcome competencies.

Standards

Concern for standards is at the heart of professional body involvement in higher education. Most professional and regulatory bodies have maintenance of standards as part of their basic rationale, indeed this is often a statutory responsibility. In the main, professional bodies approach the standards of initial education differently from the way they approach standards of professional education.

- Minimum standards are required from 'initial' education to allow a student to enter the professional stage of education and training. At the professional level the concern with standards is much more closely specified.
- PRBs adopt a range of procedures for assessing and monitoring standards ranging from a centrally set and assessed professional examination to an integrated partnership approach, which involves mutual development of curricula, work experience and continuing education.

Increasingly, assessment of standards in professional education is being delegated to the provider institutions. The shift is thus from control of standards through direct input, to indirect monitoring of standards. There is also scepticism about the possibility of comparing standards across the system and a growing preference for assessing provision against explicitly stated aims, objectives and purposes.

Quality

There is a strongly supported view within higher education that professional bodies should continue to have a role in quality monitoring in higher education although some professional bodies argue that they need no role beyond accreditation.

- Most professional bodies adopt an 'arms-length' approach to initial education. There is a growing tendency for professional bodies to delegate and trust higher education institutions to provide a suitable initial education.
- A few professional bodies are directly involved in external quality monitoring (undertaken by HEFCs and HEQC) although with little involvement in the criteria upon which assessments are based.
- There is a strong desire, in some quarters, to attempt synchronisation of professional procedures with other forms of external quality monitoring.

Professional accreditation, teaching quality assessment and quality audit have different purposes, which minimise the possibility of significant convergence. Most professional bodies see their focus in terms of content, delivery and standards of courses rather than institutional quality assurance mechanisms.

Changes in professional education

The future development of professional education has to address three major issues: National Vocational Qualifications; lifelong learning; and the globalisation of the professions. In addressing these issues PRBs have generally taken a positive, pro-active approach.

- The concept of lifelong learning has manifested itself within continuing professional development (CPD) activities. The critical imperative for members of professional organisations to undertake CPD activity must be the rationale behind the CPD drive. The strength and clarity of this rationale varies between organisations.
- The involvement of professional bodies in the development of NVQs at all levels is widespread. The main area in which professional bodies appear to be involved is the development of occupational standards.
- It is beyond NVQ level 3 that reservations are disclosed about the implementation and success of higher-level vocational qualifications. At the higher level, the professional level, occupational standards are seen to encompass qualities that cannot be expressed in terms of competencies.
- The imperative towards the internationalisation of the professions has been provided, in recent years, by the EC proposals for the recognition of academic and professional qualifications across the Community in order to facilitate the concept of freedom of movement.
- There is a fear that standardisation across the professions, in order to achieve international comparability, will provide a narrow and limited programme of study, especially at the initial education level; this will not benefit those students who wish to study a professional course but do not wish to enter the profession.

The concern of professional bodies to remain the major directors of professional education means that their response to these issues is integral to the future success of any development that is made.

Recommendations

The following recommendations are based on the review of professional body involvement in higher education and the perspective expressed by representatives of various professional and regulatory bodies.

- Professional bodies should define the specific competencies, including underpinning knowledge, that are required of graduates in order for them to be effective practitioners.
- To facilitate the maintenance of standards, professional bodies should design an *explicit* skills and knowledge template to enable a clear specification of threshold standards of attainment.
- However, the responsibility for setting and monitoring standards should be a joint endeavour between teachers in higher education institutions and key stakeholders, including professional or regulatory bodies and employers.
- Higher education and professional bodies should consider for whom the standards are being set—the practitioner or the academic. For example, accountancy as an academic discipline worthy of study is seen in a very different way in relation to practice.
- Academics may be better suited to setting academic standards, but professional bodies may be better suited to setting competence-based standards, taking account of necessary underpinning knowledge.
- There is a shift away from direct control of standards by professional bodies towards indirect monitoring of standards. This move should be encouraged in the light of partnership arrangements between other external quality monitoring agencies.
- The tendency for professional bodies to use the external examiner system—to which they contribute by recommending suitable examiners—to monitor standards of initial and professional education should be encouraged.
- The promotion of continuous learning by professional bodies, in the form of CPD, is to be applauded. However, organisations should consider the effectiveness of mandatory schemes in facilitating the development of professional responsibility. They may also want to consider a more systematic way of accrediting CPD.
- Professional bodies should consider the potential cost of CPD to their members. The encouragement and monitoring of employers with regard to the provision of dedicated resources for CPD should be a priority of professional organisations.
- If NVQs are to be developed in partnership with professional bodies at higher levels, then the competence-based assessment criteria of NVQs need to take account of the reflective practitioner.
- In developing procedures to allow mobility through international comparability, professional bodies should guard against standardisation that results in a narrow and limited programme of study, especially at the level of initial education. The interests of those students who wish to study a professional course but do not wish to enter the profession should be considered.

These recommendations have a wider relevance in terms of the ongoing discussion about the nature and control of quality monitoring in higher education in Britain. However, in light of the differing concerns of the PRBs and those of the funding councils and HEQC there is unlikely to be any significant merging or closer synchronisation of procedures unless 'standards' becomes a central issue in quality monitoring.

Chapter 1
INTRODUCTION

Professional education and training is an important aspect of post-compulsory educational provision in Britain. A significant proportion of higher education provision is linked, in one way or another, to professional education and training. In addition to specific professional education there is also a considerable amount of generalist education, in areas such as management, which is related to the professions.

Of the 92 professional and regulatory bodies (PRBs) who responded to the *QHE* survey, 74 award professional qualifications. [1] As such, the PRBs who are charged with overseeing the professions play a significant, if unheralded, part in higher education.

> The growth of professional education is perhaps the most significant feature of the development of higher education in the UK over the past thirty years and generally across the western world. In the UK, there are ninety-plus professional bodies associated with courses offered by universities, colleges and polytechnics. Many higher education courses are designed jointly with professional bodies, or receive accreditation from them such that graduates can either claim exemption from professional qualifications or move—on graduation—directly to a position in the profession (even if under some kind of probation or the tutelage of an experienced practitioner). (Barnett, 1992, p. 185)

There are four key aspects of the role played by PRBs which impact on higher education:

- specifying the nature of the education and training required for entry to the profession;
- assessing the knowledge, competence and values of aspiring professionals as a condition of entry to the profession;
- ensuring that the providers of professional education and training are suitable;
- specifying the ongoing education and training required for continued practice within the profession.

PRBs are extremely varied in organisation, scope, power and involvement in their field, which is reflected in a wide range of types of involvement in higher education. Professional bodies are in no way a homogeneous group and they differ markedly from regulatory bodies.

Not all PRBs address all the four areas, above. Even where they do, PRBs often delegate some of these roles to higher education institutions.

The *QHE* research

The research, undertaken as part of the *Quality in Higher Education* Project, examines:

- the variety of involvement of PRBs in higher education;
- what role they play in defining knowledge and competence;
- how they assure the standards of those joining the profession;
- how they assure the quality of provision of professional education and training;
- what arrangements are made for continuing professional development (CPD).

The research is based on a sample survey of professional bodies, in-depth interviews with representatives of a sub-group, the discussions at the *QHE* 24-Hour seminar (December 1994) and a review of the literature (see Appendix 1, for details).

All of this is set in a broader context, encompassing a number of current debates in higher education, which impinge on professional education and training, including:

- the nature, purpose and methodology of quality monitoring;
- the way institutions set, assess and monitor standards;
- the overlap between different forms of quality monitoring;
- the relationship between higher-level National Vocational Qualifications (NVQs) and professional qualifications;
- the Europeanisation of professional education in Britain.

There is a growing demand for rationalisation of quality monitoring in Britain. British higher education contends with five forms of external quality monitoring, which is not matched anywhere else in the world. These five are:

- institutional quality audit;
- teaching quality assessment;
- research assessment exercise;
- the system of external examiners;
- professional body approval and review.

In reviewing the role of professional bodies in higher education, the report will consider the relationship between professional body approval and other forms of external quality monitoring (with the exception of the research assessment exercise, which is marginal to the interests of professional bodies).

The Higher Education Quality Council (HEQC) are undertaking a review of the overlap between their procedures and those of the professional bodies that have the most involvement in higher education. Preliminary results, reported in Brown (1994), suggest that there is some similarity between the information required for PSB course approval and for HEQC audit.

Similarly, the funding councils, in the refinement of their quality assessment procedures, are developing collaborative models with some professional bodies. For example, in England, HEFCE is working with some of the professional bodies in engineering and architecture and with the Central Council for the Education and Training of Social Work (CCETSW). These are explored in more detail in Chapter 5. [2]

In Scotland, the funding council (SHEFC) has had contact with professional bodies through their nomination of assessors for assessment visits. However, there is currently no joint exercise in assessment with any professional bodies although, in principle, the opportunity for joint assessment is welcomed. SHEFC note that in establishing joint assessment a clear line would need to be drawn between assessment and accreditation.

A significant issue is the burden that quality monitoring places on staff at all levels within institutions and there is pressure to reduce this burden:

> One important broker in some areas of higher education and employment (including self-employment) may be the professional body. I am therefore glad that *QHE* is looking at the role of such bodies in higher education quality assurance. Many courses are accredited by them and often such accreditation constitutes a necessary pathway into employment and progression into the chosen profession. Accreditation is sometimes seen as yet one further quality assurance burden alongside assessment and audit; but I am glad that the Funding Council, the Quality Council and a number of individual universities are working with professional bodies to minimise the combined burden. (Boswell, 1994, p.10)

Definitions

There is considerable confusion over the exact specification of the core concepts addressed by the research, which need to be clarified. There are numerous problems when providing definitions of 'complex historical-anthropological phenomena' that are widely used but rarely closely specified (Brante, 1990). Different people have widely differing expectations of what ought to be encompassed by any set of definitions. Definitions of 'profession', 'professional body', 'professional association' and 'regulatory body', explored in Chapter 1, are difficult enough. Definitions of 'quality' and 'standards', addressed in later chapters, are far more problematic and far less likely to meet with universal approval.

Nonetheless, the operational definitions used throughout the report are specified to provide a clear indication of the meanings attached to key concepts.

Regulatory bodies

A regulatory body is created by government to regulate qualifications and /or training for a particular occupation, for example, the Engineering Council for the UK, the General Medical Council (GMC), the United Kingdom Central Council for Nursing, Midwifery and Health Visiting (UKCC) and the Teacher Training Agency (TTA).

Unlike professional bodies, regulatory bodies do not offer membership to practitioners and do not see themselves as serving practitioners in the first instance. The Teacher Training Agency, for example, serves:

> the educational community generally. Specifically we serve the Secretary of State as agents of the Education Act within the remit we were given in that Act. We serve the DFE, we work closely with OFSTED who gather the quality information we often use when taking decisions, and we serve the colleges and schools that are involved with teacher training. (TTA, 1995)

Regulatory bodies exercise control over the profession in various ways. They are 'external' watchdogs at one step removed from the profession. Regulatory bodies usually:

- control entry to the profession by specifying the required knowledge and competence;
- maintain a register of practitioners, inclusion on which is required for continued practice;
- enforce a code of practice determined to be in the public interest.

Most, but not all, regulatory bodies are established by statute and have their powers defined by statute. Furthermore, not all regulatory bodies maintain a register of practitioners.

Of the 88 bodies responding to the *QHE* survey, 15 are regulatory bodies—9 of these, mainly in the area of medicine and health, have statutory powers and maintain a register of practitioners:

General Medical Council
Council for Professions Supplementary to Medicine
General Dental Council
UK Central Council for Nursing Midwifery and Health Visiting
Welsh National Board for Nursing Midwifery and Health Visiting
English National Board for Nursing Midwifery and Health Visiting
National Board for Nursing, Midwifery and Health Visiting for Scotland
The National Board for Nursing, Midwifery & Health Visiting for Northern Ireland
Architects Registration Council of the United Kingdom

Two further bodies have statutory powers but do not maintain a register of practitioners:

Central Council for Education and Training in Social Work
Teacher Training Agency [3]

Another four organisations are regulatory bodies with no statutory powers. Registration with these bodies is not required in order to practice.

British Acupuncture Accreditation Board
General Council and Register of Naturopaths
General Council and Register of Osteopaths Ltd
National Council for Drama Training

Profession

Definitions of 'profession' take two broad forms, the *explanatory* and the *conceptual*. The explanatory identifies characteristics of professionals and derives a definition inductively. The conceptual attempts to encapsulate the essence of a profession in the definition.

The explanatory approach leads to all-encompassing, cumbersome definitions, a *short* example of which is:

> professions are non-manual full-time occupations which presuppose a long specialised and tendentiously also scholarly...training which imparts specific, generalizable and theoretical professional knowledge, often proven by examination. (Brante, 1990)

The conceptual approach to the definition of 'profession' tends to be more concise, for example:

> socially idealised occupations organised as closed occupational communities. (Collins, 1990)

Such definitions are elegant in addressing complex issues with an element of simplicity. Furthermore, they allow room for individual interpretation and are more flexible. However, they can be criticised on the basis that 'rather too much is left unsaid and too many questions are left begging' (Burrage *et al.*, 1990).

The professional-client relationship

At the heart of most perspectives on professions is the professional-client relationship (Downie, 1990). Professionals are consulted for their specialist knowledge and experience by people who are in no position to make an informed or valid judgement about the professional's skill or ability or integrity.

Thus, the professional-client relation is one of a power imbalance brought about by the professional's knowledge and ability and the client's needs. Parsons (1954) accepted that this could be exploited for the benefit of the professional. However, he claimed, professional values proscribe this. Indeed, professional values and codes of conduct derive from the asymmetrical relation between professional and client.

Altruism is a long-established and ingrained part of the self-image of most professions. For example, Mr Justice Brandeis, of the United States Supreme Court, writing in 1933, asserted that a profession 'is an occupation which is pursued largely for others and not merely for oneself'. Furthermore, the altruism extends to financial reward. Brandeis claimed that a profession is 'an occupation in which the amount of financial return is not the accepted measure of success' (quoted in Randall, 1994, p. 31)

Professions are distinguished from other occupations because, despite conferring (in some cases) substantial incomes:

- the professional cannot legitimately prioritise the search for profit (for example, in theory, doctors cannot seek out only rich patients and abandon those in financial difficulty);
- professionals have a degree of autonomy in protecting clients (they may not be required to disclose information to third parties, even courts or state officials).

More recently, a study of professions suggests that:

> a sense of responsibility for maintaining or strengthening the status and reputation of their profession in its service to the community is a common characteristic of professions. (Eraut and Cole, 1993, p. 7).

The asymmetric relation between professional and client, based on specialised knowledge and expertise, which is constrained by a set of values, specified as codes of conduct is so central to the concept of 'profession' that it is the basis of the explanatory definition of the concept.

The so-called 'trait theory', for example, which defines and attempts to distinguish professions from other occupations suggests an 'ideal type' profession with five major traits:

- professionals should possess abstract, esoteric knowledge;
- professionals have autonomy in work based on unique expertise, this extends to entitlement to peer review and internal policing of misconduct;
- professionals have authority over subordinates and clients, again on the basis of their esoteric knowledge;
- professionals are altruistic, they are service- rather than profit-oriented in their work;
- the public must recognise an occupation as a profession for it to be one (Hodson and Sullivan, 1990).

However, it has been argued that the altruism of the professions encoded in the 'trait theory' reflects a self-image 'energetically propagated' by professionals, (Burrage *et al.*, 1990) rather than any 'objective' traits associated with professional activity.

The health and medical professions in the United States, for example, belie the altruistic self-image (McKinley, 1977). Treatment is on an ability-to-pay basis, contrary to professional 'myth' of the disavowal of the profit motive. Health maintenance organisations (HMOs) in the USA grow ever larger, with increasingly bloated bureaucracies, and focus more on efficiency and cost-cutting rather than patient care (Rothblatt, 1994).

The 'ideal-typification' embodied in the trait theory is also difficult to sustain given the heterogeneity of the professions. Differences are manifested in many forms, for example, the amount of knowledge learned, the type of knowledge (technical or conceptual), level of autonomy in work, amount and use of authority and commitment to altruism.

Professional body

Despite the claims for altruism amongst professionals, it is the *professional body* that is entrusted with ensuring the public interest in the absence of any effective checks on the activities of the professional through the operation of the market (Ormrod, 1968).

A fairly well established definition of 'professional body' is provided by Eraut and Cole (1993, Appendix 1). A professional body is:

> an organisation formally recognised by charter or statute as having jurisdiction over a profession or a section of a profession. Criteria for full membership comprise professional examinations and a minimum period of assessed professional practice.

The major problem with this definition is that a number of organisations who self-define as a professional body do not meet the three core elements specified:

- recognition by charter or statute;
- membership dependent on passing professional examinations;
- membership dependent on a period of assessed professional practice.

For example, of the 74 professional bodies in the sample, only 11 (15%) claimed to fulfil all these criteria (Appendix 2, Table 2).

Of the remaining 24 professional bodies who have statutory powers *or* offer chartered status (32%) only 2 have compulsory professional examinations (3%) and 15 require a compulsory period of work experience towards their professional qualification (20%). The other 39 professional bodies have neither regulatory powers nor offer chartered status, although 16 require work experience and 16 require their own examinations. Most offer a professional qualification.

A resolution is to identify the key *role* of professional bodies rather than delimit them to a specified set of characteristics. In essence, professional bodies control the profession by:

- controlling entry to the profession;
- specifying ongoing requirements to practice;
- providing and enforcing a code of practice based on acceptable professional values.

Thus a working definition of a professional body is one that:

- specifies the requirements for entry to the professional body, including initial educational or professional qualifications;
- identifies requirements for continued membership, including continuing professional membership, work experience, and so on;
- has a set of regulations or code of professional ethics to which members must adhere or risk the sanction of expulsion from the professional body.

It is on this basis that 74 organisations qualified as professional bodies (Appendix 2, Table 1).

There are two types of professional body based on this working definition, those for which membership is *compulsory* for practice within the profession (such as solicitors) and those where membership is advantageous but where it is possible to practice without being a member of the professional body (such as electrical engineers). Of the sample of 74 professional bodies, being able to practice required membership of the appropriate body in 13 cases (Table 1.1). For one other professional body (The Royal Society of Chemistry), membership was required to practice in a limited range of areas (for full details of registration, see Appendix 2, Table 3)

Specification of requirements for entry, identification of requirements for continued membership and the extent of regulatory powers vary enormously between professional bodies.

For example, entry requirements to a professional body include one or more of the following:

- a suitable undergraduate qualification;
- a postgraduate qualification;
- obtaining a qualification provided by the professional body;
- a period of time as a practitioner (which may or may not be supervised or assessed);
- being sponsored;
- joining the professional body.

The requirements for continuing membership might be the payment of an annual fee, continued employment within the profession, some form of CPD, and so on.

Regulatory powers may be those specified in the charter or statute, which operate with the force of law, or may be based on the withdrawal of membership. The body may maintain a register of practitioners, and may strike those who breach the code from the register (which, in most cases, will prevent further practice).

The differential between a professional and a regulatory body is 'fuzzy' at the edges. Some regulatory bodies get involved in activities akin to those of professional bodies. The Teacher Training Agency, for example is:

> a professional regulatory body and increasingly a professional advisory body as we get further involved with activities such as CPD, but we are not a representative body, we may present views to the Secretary of State but this wouldn't be of any one sector in particular. Our views are representative rather than representing. (TTA, 1995)

Table 1.1: Registration with body required for practice in the profession

ID	Name	Body type	Registration necessary to practice
7	Chartered Association of Certified Accountants	PB	Yes
16	Chartered Society of Physiotherapy	PB	Yes
40	Institute of Legal Executives	PB	Yes
55	Law Society	PB	Yes
61	Royal Pharmaceutical Society of Great Britain	PB	Yes
70	The Institute of Physics	PB	Yes
74	The Royal Institution of Chartered Surveyors	PB	Yes
39	Institute of Internal Auditors	PB	Yes
30	Institute of Chartered Accountants of Scotland	PB	Yes
50	Institution of Civil Engineers	PB	Yes
71	The Law Society of Northern Ireland	PB	Yes
72	The Law Society of Scotland	PB	Yes
29	Institute of Chartered Accountants in Ireland	PB	Yes
62	Royal Society of Chemistry	PB	Yes*
81	National Board for Nursing, Midwifery & HVfor Scotland	RB	Yes
84	UK Central Council for Nursing Midwifery and Health Visiting	RB	Yes
85	Welsh National Board for Nursing Midwifery and Health Visiting	RB	Yes
80	General Medical Council	RB	Yes
75	Architects Registration Council of the United Kingdom	RB	Yes
78	English National Board for Nursing Midwifery and Health Visiting	RB	Yes
79	General Dental Council	RB	Yes
83	The National Board for Nursing, Midwifery & HV for NI	RB	Yes
77	Council for Professions Supplementary to Medicine	RB	Yes*

* In special cases PB=Professional body RB=Regulatory body

In the last resort, it is membership that distinguishes a professional body from a regulatory body. Many professional bodies have different levels of membership ranging from some form of associate membership (including student membership) through 'ordinary' membership to some form of 'higher-level' membership, such as fellowships of the organisation. In the *QHE* survey, 68 of the 74 professional bodies offered membership in stages.

Professional associations and voluntary organisations

Professional associations can be distinguished from professional bodies in that they have no control of the profession. Professional associations do not provide professional qualifications and membership is not required to practice. They are organisations where membership is based only on subscriptions and occupational allegiance.

A professional association is a community of practitioners who exchange ideas, information and practices and who act in mutual support for their own interest. They have characteristics similar to learned societies, such as the Royal Society for the Promotion of Health, or to trade unions, such as the Royal Economic Society, which is 'a professional association that promotes the interests of economists in academic life, government service, banking, industry and public affairs'.

However, the distinction between professional associations and professional bodies is not always as clear-cut, especially where the professional body does not have close control vested through extensive statutory powers. It is, for example, a moot point whether the Royal College of Nursing or the Royal College of Midwives are professional bodies or professional associations. Professional associations, for example, often have codes of conduct, misconduct can lead to expulsion, membership is sometimes advantageous in terms of employment, and so on.

There are also voluntary organisations that have involvement with higher education courses, such as the National Council for the Training of Broadcast Journalists (NCTBJ). The NCTBJ is a

voluntary organisation made up of 'all sides of the radio and television industry, the National Union of Journalists and colleges which offer courses in broadcast journalism'. However, it is not a membership organisation. The role of the NCTJB is to maintain industry standards of training. Its involvement in higher education is through the Council panel, which makes periodic visits to courses and grants recognition to those that reach the required quality. The courses recognised range from part-time modules, through one-year postgraduate diplomas to three-year degrees.

Initial and professional education

Although professional bodies vary enormously in the requirements they place on entry to the profession and the specification of the necessary education and training, there is a broad tendency among many professions for a two-tier approach.

The first tier of education is often referred to as *initial* education and frequently consists of a specified type of undergraduate degree programme or diploma in a college or university.

The second tier is the specific *professional* training and takes a variety of forms. Sometimes these are based in a wide range of universities and colleges. Sometimes provision is limited to a number of regional centres, as in the case of the Chartered Institute of Bankers, and occasionally restricted to a single specialist training establishment, as for example in the training of barristers in Britain.

The level of professional education is an important factor when addressing the current or potential role of professional bodies in curriculum design, standards setting and quality monitoring. There is much more ambiguity about the effective role that can be played by professional bodies in initial education and rather less at the professional stage.

The Library Association makes a clear distinction between the role of the professional body and the role of the educational institutions with regard to initial education, indeed, this is rooted in the tradition of the Association; [4]

> In other words recognising that it is the right of the universities to teach and set their own academic standards but it is the right and responsibility of a chartered professional association to determine what in terms of the theory that students acquire is relevant for professional practice, it is then for the university to decide how best to deliver it. (LA, 1995)

The following chapters address the issue of regulatory and professional body involvement in higher education within the broad context explored in the introduction. Chapter 2 considers whose interests are served by professional bodies. Chapter 3 considers the role of PRBs in determining the nature and content of the education and training required for entry to the profession. Chapter 4 explores the involvement of PRBs in setting, assessing and comparing standards. Chapter 5 examines professional body involvement in higher education quality assurance procedures. Chapter 6 considers the likely impact of changes in professional education, including the development of higher-level NVQs, continuing professional development and the globalisation of professional education and training.

Summary points

- Professional education and training is an important aspect of post-compulsory educational provision in Britain. PRBs have a role in specifying the nature of the education and training required for entry to the profession; assessing required knowledge, competence and values; ensuring the suitability of providers of professional education and training and specifying continuous professional development.

- PRBs are extremely varied in organisation, scope, power and involvement in their field, which is reflected in a wide range of types of involvement in higher education.
- The professional-client relationship is one of a power imbalance brought about by the professional's knowledge and ability and the client's needs. Professional values supposedly proscribe the exploitation of this relationship.
- The professional body is entrusted with ensuring the public interest in the absence of any effective checks on the activities of the professional through the operation of the market.
- Although professional bodies vary enormously in the requirements they place on entry to the profession and the specification of the necessary education and training, there is a broad tendency among many professions for a distinction between *initial* education and *professional* training.

Chapter 2
INTERESTS

Analysis of the nature, role and functioning of professional bodies revolves around a core dilemma: are professional bodies a means to safeguard the public interest or do they exist for the benefit of their members? If the latter, is the primary concern to maintain the status and privileges of the profession or to act as a focus for the dissemination of good practice, the exchange of ideas and the continuous education of members?

Indeed, professional bodies have three potential foci of interest:

- the public interest—in which case they act as a watchdog (in a way similar to regulatory bodies, but from within the profession);
- the interest of the professional practitioners—where they act as a professional association or trade union (including legitimating restrictive practices), or as a learned society contributing to continuous professional development;
- self-interest—where they act to maintain their own privileged and powerful position as a controlling body.

The public interest

Professional bodies can serve the public interest through their educational function. First, through their control of the supply, training and operation of professionals, they are able to offer the public a safeguard against the potential exploitation of the inequitable relationship between professionals and clients.

> The Law Society has certain duties because it is a statutory body in the sense that it operates under Statute. It has a duty towards the general public to oversee certain aspects of legal education. (LS, 1995)

Second, the special set of rules adopted by each profession develops a discipline among its members and detaches them from individualist egoism (Durkheim, 1893). In some cases this involves registration, without which it is not possible to practice. Such registration is seen as a vehicle for public protection (NBNMHVS, 1995).

Professional title as guarantee of competence

The professional title is the guarantee of competence for the lay person approaching the professional. This gurantee does not just relate to the knowledge and competence of the professional but to professional conduct and ethics. For the professional body this means that there must be:

- rules of conduct, to prevent abuse of the unequal relationship;
- disciplinary sanctions (preferably backed by statute) where conduct occurs that is detrimental to the relationship;
- a system of education and training that will produce the competence to which the title attests.

For example, The College of Speech and Language Therapists (CSLT) has a published Code of Ethics and Professional Conduct which states that 'the primary professional obligation for all speech

and language therapists is the long term welfare of the client'. It specifies the standards of competence, conduct, integrity and confidentiality expected of a registered speech and language therapist. It provides the basis for judging alleged misconduct. 'If an individual's behaviour falls materially below that indicated by the code, that individual may be subjected to censure and/or expulsion from the register of the College' (CSLT, undated). Furthermore: the College:

> exercises a monitoring role over courses, to ensure that any changes introduced or planned do not compromise the ability of courses to deliver a qualification leading to clinical competence in the field of speech and language therapy. Failure to conform to the criteria laid down from time to time by CSLT can lead ultimately to suspension or withdrawal of accreditation from a course. (CSLT, 1995)

How effective the threat of expulsion is in ensuring compliance to professional values depends on the need to be a member of the professional body. In the *QHE* sample, 12 bodies indicated that the qualification was legally required for practicing the profession and 6 of these that registration with the professional body was also required. Another 7 bodies indicated that while their qualification was not legally required, registration with them was necessary to practice. Another 31 bodies suggested that their qualification was generally required by employers.

Statutory powers and autonomy

Statutory powers accorded to many professional and regulatory bodies by Parliament provide the public guarantee that the professional title is an adequate indication of competence. For example, The General Dental Council (GDC):

> is a statutory body, independent of government, set up by Parliament under the *Dentists Act*, 1956 and 1984. ... The Council exists primarily to protect the public. The Council maintains a register of dentists permitted to practice in this country, supervises the educational standards required for admission to the register, and exercises a disciplinary jurisdiction over the conduct of registered dentists. (GDC, 1994)

Similarly, The United Kingdom Central Council for Nursing, Midwifery and Health Visiting (UKCC) uses enabling legislation to exercise control over the training of health professionals:

> Our power lies in our legislation. A very simple sentence but a very powerful one—to establish and maintain standards of education and training and practice for nurses, midwives, and health visitors. So, in educational terms we do that through a considerable amount of secondary legislation... In terms of practice, we deal with it slightly differently, we provide a range of advisory documents, but given that the advisory documents arise from the law, they have the power of law, even though they are not legal documents in their own right, in the same way that statutory instruments relating to education are. (UKCC, 1995)

In similar vein, the Law Society is empowered through statute to specify the education and training that a would-be solicitor must undergo.

Essentially, the control has been based on the need to ensure that the new recruit is sufficiently well versed in the 'esoteric' knowledge required to carry out the professional role. It is control over the expert, esoteric knowledge, which perhaps affords the profession their power and privilege.

The delegation of control of the profession to the professional body ensures that they have considerable power and autonomy. Such autonomy, it is argued, is necessary if professional bodies are to best serve the public. Without this autonomy, the professional body would be hampered in both the exercise of its control over members and the adaptation of requirements for education and training in light of changed social, economic and cultural circumstances.

Interest of the professional practitioners

Some professional bodies are clear that they serve the interest of their members. The Gemmological Association and Gem Testing Laboratory (GAGTL), for example, is clear that they exist to serve their members alone. They are independent, have no government support or statutory regulatory role, and maintain themselves by their activities. Other professional bodies see their role as split

between their public responsibility and their membership. In relation to the latter, their role approximates that of either a trade union or a learned society or both.

'Trade Union' role

Professional bodies also have a role, not dissimilar to trade unions, in protecting the interests of members:

> We work very much with people in the round, conscious that we're a members' institute. So we're here to promote and protect individuals interests. (CIB, 1995).

> Our stakeholders are our members. We are entirely funded by members. We still have a campaigning and lobbying role, we are still concerned with the setting of professional standards both in terms of service provision, that is guidelines and standards for different sorts of libraries and information services, and of course for professional education and training. We still accredit courses in universities and we still maintain our own professional register. (LA, 1995)

Professional bodies do not necessarily stand *in lieu* of trade unions but often work closely with them on professional issues, for example:

> There are places on our Central council that are taken by representatives of the banking unions—they've had them since the 1920's.... At the moment the banking union is taking a great interest in education, they're involved with NVQ's and they do a great job. And yes, we work very closely. There is correspondence going on with them at the moment about privileged examination entrance fees for union members, but also particularly about NVQ's which they are keen to promote. (CIB, 1995)

However, for many professional bodies, the self-perception of professions as altruistic makes them nervous of any recognition that they function in any way like a trade union representing the working conditions and interests of the members.

> We serve the public at large, as our members have to act in the public interest, but we also have to take into account the needs of our members. We are not a trade union, nor are we there solely to do what our members say, we have to take a wider view than those individuals. (IoB, 1995)

Yet, many professional bodies are constituted like trade unions and act in many respects like trade unions. Many professional bodies, such as the Institute of Chartered Secretaries and Administrators (ICSA), operate a branch structure that provides support for members on a regional basis.

> We have branches around the country and indeed around the world. When someone registers with us as a student or as a member they're allocated to a branch depending on their postcode or their geographical area.... It is similar, I suppose to trade unions, but, there are many other professional bodies that have a similar structure, ACCA have a regional structure of branches as well.... CIMA which is a sister professional body have a very similar branch network and, in fact, we often get together in a region and have a joint event. (ICSA, 1995)

'Learned society' role

Professional bodies, unlike most trade unions, have a role as learned societies. They provide a forum for the exchange of ideas and play a part in the continued education and training of members. The Institute of Biology, for example, evolved out of discipline-based learned societies in the 1950s.

> The Institute of Biology was founded in 1950, and is the professional body for UK biologists. It has a Royal Charter which it received in 1979, and its main aims are to advance the science and practice of biology: that's the first aim. To advance education therein, the second aim. And thirdly, to co-ordinate and encourage the study of biology and its application. (IoB, 1995)

Similarly, the Gemmological Association and Gem Testing Laboratory (GAGTL) sees its role as keeping members informed and maintaining interest in gemmology:

> We are a professional society, similar to many other learned societies in the UK like the Geological Society, or the Mineralogical Society, and to that end we provide facilities for members in the form of lectures, courses, conferences and publications. The publications we have include the *Journal of Gemmology* and

> *Gem and Jewellery News* and both of those are quarterly, so every member gets eight publications a year coming at six weekly intervals to keep them in touch—to keep them interested in gemmology. (GAGTL, 1995)

The Institute of Electrical Engineers (IEE) also sees its primary role as a learned society for its 130,000 members, although they place more emphasis on a continuous programme of conferences and seminars. 'We're an international organisation and our primary activity is to provide learned-society activities, technology transfers, to re-educate our members throughout their careers' (IEE, 1995).

The Chartered Institute of Banking likewise provides members with opportunities to learn throughout their careers:

> We are probably more successful than any other comparable professional body in retaining people once they have qualified. We're not like the lawyers or accountants *they don't have to register to practice,* so what is it that keeps them? A fondness for the Institute of course, but it's more the range of local centre activities, the chance to go on courses, seminars, magazines. (CIB, 1995)

The Chartered Society of Designers similarly supports its members through providing opportunities for networking and the provision of information as well as 'through organising training and seminars, through producing contract documents and giving them advice about copyright and design protection' (CSD, 1995).

Arguably, this continuing educational role of the professional bodies, derived from its 'learned society' role, serves the public interest as well. The continued education and training offered to members as well as the networking and opportunities for debate that professional bodies facilitate, ensures that professionals are up-to-date and that they exchange good practice. [5] In such circumstances, the professional can act more efficiently and effectively for their clients and thus better serve the public interest.

The Institute of Biology, for example, claims that its educational role is in the public interest and that it has a much stronger educational remit than the learned societies as its Charter requires 'a much broader view' (IoB, 1995). Similarly, the Chartered Society of Design, sees part of its role as *public education* through the promotion of design.

> The purposes of the Society as set out in the Royal Charter, are essentially around what is in the public good: promoting design in various ways, encouraging and regulating the profession of a designer and stimulating education, the study of design. So it's really to promote, to regulate and to study. That's a pretty wide ranging brief really and it means that we're involved in all sorts of issues, of maintaining standards, of liaising with clients, helping to get people to understand more about design. (CSD, 1995)

Autonomy and vested interest

Given the membership-oriented role of professional bodies, the autonomy, to which they cling and which is often conferred on them by statute or charter, might be seen as a mechanism for ensuring the interest of professional practitioners at the expense of the public. On the evidence of the recent *QHE* 24-Hour Seminar, there is a predominant view among academics that professions are conservative and self-interested (Harvey and Mason, 1995, p.37). For example, groups associated with engineering, health, medicine, law, accountancy and architecture all expressed concern about vested interests among professions.

For most delegates, there was concern that the controls on the supply of new recruits into the profession were self-serving rather than in any way serving the public interest. Veterinary science and radiography were singled out as professions that tightly controlled supply to ensure their own privileged position through restrictive regulation of new entries to the profession.

This view is not surprising given the explicit position of some professional organisations. The Institute of Electrical Engineering (IEE), for example, sees its secondary function as maintaining an élite organisation of electrical engineers. The IEE have very stringent requirements for full membership, which allow the use of their designatory letters:

> at least a second-class honours degree on an IEE accredited educational course or its equivalent and two years in a responsible position. It is usual for our chartered members to reach that position at about age 29. (IEE, 1995)

Self-interest of the professional body

Despite the statutory powers, and other means of control exercised by professional bodies over practising professionals to ensure minimum levels of competence and the adoption of appropriate sets of values, there is considerable scepticism that such bodies are primarily concerned with the public interest.

There is also a question as to whether professional bodies act to codify and represent the acceptable practice of the profession or whether it is the professional body itself that determines the code of behaviour for the profession. In short, is the professional body there to protect the public interest or determine what is in the best interest of the public? Siegrist (1990) suggests it is the latter rather than the former:

> It is the professional organisation itself which defines the scope of professional practice determines norms and values for its members, and strives for general recognition of its fundamental concepts from other social and political groups.

An important aspect of the work of the professions is to instil a professional ideology in its members while at the same time legitimating the operation and structure of the profession.

A significant element of the activities of professional bodies is their role in representing the profession to the public, to policy makers and to other significant opinion-formers, such as the media. A professional body will be more effective in putting the case for a profession if it can speak with a single voice; 'a unified profession can better protect its autonomy and influence public and governmental opinion than one that speaks with many voices' (Brante, 1990). For example, the Institute of Biology tries to 'provide leadership and a unified approach to biology, so that the voice of biologists is heard on various policy issues involving biology and biological education' (IoB, 1995).

It is much easier for a professional body to represent the profession if it prescribes the position of the profession rather than attempts to derive it through a consensus of members or develop it from a consumer point of view.

Indeed, professional bodies gain much of their strength and power through the representational role. By being the voice of the profession, the professional body also shapes the nature of the profession.

Professional power and privilege

The issue of public, professional or self-interest depends on the centrality of the professional-client relationship in discussions of the role of professional bodies. An alternative approach argues that this relationship is not as asymmetrical as it appears and, furthermore, is not central to an analysis of the role and functioning of professional bodies. Instead, emphasis should be placed on the exclusive organisation of the professions and the role of professional bodies in the maintenance of the exclusivity.

There are three broad arguments against the idea that the power of professions is grounded in the specialist knowledge that the professional has and the client requires.

First, the public, in their role as clients, are increasingly well-informed and consequently there is a lot more questioning of professional actions and beliefs. Clients no longer show an unquestioning trust in professionals. The medical profession has seen this illustrated recently with the increase in after-hours doctor call-outs. Despite the nation becoming more healthy rather than less, the

number of doctors called out by patients after-hours has increased dramatically in recent years. This increase has been attributed to a more demanding public, possibly fuelled by initiatives such as the *Patients' Charter*. This change in the professions' client-base may be seen as a product of a 'Charter-led' society empowered by consumerism. For some professional bodies, it is this rise of consumerism that has effected a sea-change in the professional-client relationship.

> Why do people question exam results? When I first came here no-one would dream of questioning an exam result. Now, they're brought up in school to challenge, and they've seen that if you challenge you can have your 'O' level improved by 2 grades.... I'll do a professional qualification, I get a fail — I'll challenge you. I want my marks. It's not good enough to hide behind 'the examiner's decision is final'. How dare you! This is all down to consumerism. (CIB, 1995)

Second, the knowledge is not 'specialist' but 'esoteric', which is an important distinction. Induction into the esoteric knowledge is similar to induction into the 'mysteries' of a cult designed to limit access and mystify non-members. It has been suggested that professions survive through their domination of conventional systems for solving particular problems in their particular occupational areas. They train limited numbers of others to use these systems and fight against alternative solutions. In this way they protect their position through standardisation and through a hegemony of their knowledge system. (Collins, 1990).

Third, the root of professional power is not their knowledge but the organisation. Friedson (1975), for example, reverses the 'trait theory' approach to professions. Instead of identifying a set of traits that identify professions he defines a profession as an occupation with a special form of organisation and a special form of legal power (analogous to that of bureaucratic officials). Unlike many sociologists before him who tend to define professions in terms of altruistic claims they make, Friedson argues that the professional ethic of community service should be seen as a device used by occupational groups to obtain exclusive rights to practice. Thus, the successful profession (such as medicine) has a legal-rational base that:

- consists of a monopoly of occupational rights (granted by the state);
- gives it freedom to control the process of recruitment, training and practice;
- authorises it to control the conduct of individual members;
- gives it autonomy, that is, immunity from assessment by lay observers—a restricted form of peer review (that does not allow information to be passed outside the profession), which amounts to a form of self-regulation.

Unlike Parsons, Friedson does not see technical expertise or esoteric knowledge as a basic source of medical power. Rather it is a process of bureaucratisation (Weber. 1922).

Occupational autonomy has been at the heart of professional power seen at its most effective in medicine. Autonomy means a lack of direct accountability. Medicine has been so successful because the state or insurance companies mediate the relation between medicine and patients.

Allowing professions to control the entry of new recruits has been a major plank of the privilege afforded professional bodies. It allows the professions to safeguard their jobs and the high material rewards and status accompanying them.

The core dilemma facing professional bodies—safeguarding the public interest or the interest of their own members—has led to suggestions that, as professions are heterogeneous, then both altruistic and self-interested professions or individuals within a profession are likely to exist. This misses the point. The self-interest of professions *is served by safeguarding the public interest*. This occurs in two ways:

- it is easier to retain power and privilege if the public perception of the service provided is positive;
- claiming to safeguard the public interest provides a legitimation for exclusivity of practice, prestige and privilege.

However, in the last resort, altruism gives way to self-interest. Professional bodies represent their members and are there to safeguard the interest of members as a whole, which is where they differ from regulatory bodies. [6] In some areas, such as 'alternative' medicine there is a distinct attempt to separate the regulatory from the representative function. For example, the General Council and Register of Naturopaths is a non-statutory regulatory body established alongside the professional association. A similar situation obtains for chiropractice and osteopathy.

Furthermore, the professional bodies take on a life of their own and through their accountability and control function are concerned to ensure the self-interest and perpetuation of the professional body itself over and above the interest of either the profession or its members.

For example, the Library Association, up to the 1960s, had a stranglehold on the profession. It started as an examining body at the end of the 19th century and, with the exception of one university department, the Library Association examinations were the only way of qualifying to become a librarian. However, its grip was loosened following the *1944 Education Act* and the development of the Polytechnics. The people teaching the courses in the Polytechnics and new universities in the 1960s were nearly all chartered members of the Library Association. Although they appreciated the campaigning role of the Association they wanted to reform the Association's approach to education. Essentially, they were opposed to the restrictive nature of the examinations and saw that they bore little relation to what practising librarians were actually doing.

> It became apparent in the 1960s that the delivery of education was becoming independent of the Association.... The Association itself had realised, by the early 1970s, that it had got to find a new role. It set up various working parties to look at a future role.... We determined that we would find a way in which the universities and polytechnics running our courses would be able to develop courses and to be able to teach what they wanted to teach within a very general framework of what we would find acceptable from a professional point of view and we would seek to accredit those courses not from the perspective of academic merit but the relevance to professional practice. (LA, 1995)

Professional education as a defence of privilege

The control exercised by the professional bodies over professional education is thus, arguably, a defence of a privileged position. This defence is manifested in two ways. First, a bureaucratisation of professional education and professional career—manifest in the exchange of diplomas and certificates (Merton, 1957). Professionalisation leads to

- a tendency for qualification;
- a tendency to academicise professional training;
- the search for status and security.

Second, professional training is not just about ensuring a given level of competence but also:

> helps each profession to barricade itself in a quasi corporate group, which defends its status and its privileges in the name of the training undertaken rather than through the service given to the clients.... Professionalization cannot be analysed as merely a tendency towards qualification. It also contributes to a move towards a tertiarization of the labour market, with low productivity, typically coupled with the defence of narrow corporate interests. (Boudon and Bourricaud, 1989, p. 280)

In considering the role of the professions in higher education the report will explore the extent to which the professional bodies ensure competence of practitioners, perpetuate a privileged position for professionals, or entrench their own position through professional education and training.

Summary points

- Analysis of the nature, role and functioning of professional bodies revolves around a core dilemma: are professional bodies a means to safeguard the interests of the public, the professional practitioners, or the professional body itself?
- Professional bodies, through their educational function, offer the public a safeguard against the potential exploitation of the inequitable relationship between professionals and clients.
- The professional title is the guarantee of competence, which requires rules of conduct, disciplinary sanctions and a system of education and training that will produce the competence to which the title attests.
- Some professional bodies are clear that they serve the interest of their members either in a 'trade union' role or a 'learned society' role. Other professional bodies see their role as split between their public responsibility and their membership.
- There is a question as to whether professional bodies act to codify and represent the acceptable practice of the profession or whether it is the professional body itself that determines the code of behaviour for the profession.
- The delegation of control of the profession to the professional body, often via statute, ensures that they have considerable power and autonomy. This is claimed to be necessary to ensure effective control over members and adaptation of requirements for education and training in light of changed social, economic and cultural circumstances.
- With the growth of consumerism, doubt is cast on the centrality of the professional-client relationship as a legitimation for professional power and privilege. Furthermore, it is perhaps not the 'esoteric' knowledge of professionals that gives them their power but the organisation of the profession.
- In the last resort, the self-interest of professions is served by safeguarding the public interest. It is easier to retain power and privilege if the public perception of the service provided is positive and claiming to safeguard the public interest provides a legitimation for exclusivity of practice, prestige and privilege.

Chapter 3
COURSE CONTENT

Professional and regulatory bodies are concerned with the content of both initial and professional education and training. They need to satisfy themselves that the programme of study equips successful students with the knowledge and ability to progress into the profession. For example:

> Our role is to assess the programme as suitable for an aspiring member of the IEE.... For example, every course should culminate in a final year project. We prescribe the need for sufficient mathematics but we don't say what that is, we let the department decide. (IEE, 1995)

The Law Society, for example, is clear that a certain minimum knowledge and skills is required before a candidate can proceed into professional education and training:

> What we are saying is: take what you want but you do need these basics if you wish to come to us for the professional education and if you haven't got them or some of them, you may have to take a refresher course, or take another course which gives you those basic building blocks. (LS, 1995)

Of the 92 bodies surveyed 42 claimed to have a *direct input* into higher education curricula, although 5 bodies indicated that they do not validate courses offered in higher education courses (Institute of Animal Technology, Institute of Chartered Accountants of Scotland, Institution of Chemical Engineers, Institution of Civil Engineers, Institution of Electrical Engineers) and two that they neither validate nor accredit courses [7] (British Orthoptic Society, UK Central Council for Nursing Midwifery and Health Visiting). 81 bodies think that they *influence* curricula.

Of the 74 bodies that indicated they offered a professional qualification, nearly half (35) indicated that some element of their syllabus is compulsory (Appendix 2, Table 4). [8]

There are various approaches to specifying syllabus content. In some cases the professional body 'owns' the syllabus and universities and colleges provide courses based on these syllabuses with the blessing of the professional body. For example, The Chartered Institute of Bankers (CIB) is unequivocal in considering that they own the courses and syllabus and that universities and colleges teach towards its examinations.

> We have a number of universities running classes for the professional qualification and FE colleges preparing candidates lower down. They're our courses, our syllabuses that are offered. (CIB, 1995)

Similarly, ACCA has a syllabus for the three stages of professional examination. It gives exemptions from examinations to students based on their qualifications and courses that they have undertaken.

> We are slightly different to other professional bodies in that we will take 'A' level entry. I think, maybe 30% have degrees but you don't have to. Then, they go on to do our examinations, which are in three stages. The final stage is probably slightly higher than a first degree. If you have done an accounting degree, we will give you quite a lot of exemptions, up to 8 or 10 exemptions out of 14 papers. But that would have to be a very structured degree that is very close to our syllabus. If it isn't an accounting degree we may only give you 2 exemptions. (ACCA, 1995)

ACCA maintains a database of courses and the exemptions from the professional examinations that are available to graduates. No course can lead to complete exemption and so to become a certified accountant, candidates must normally pass at least four professional examinations.

Some professional bodies have expectations of content based on a model syllabus but encourage local variations.

> When approving HEI programmes ICSA requires the course syllabus to quite closely match their own. They don't prescribe assessment methods (only that a project or dissertation with a strong practical emphasis is produced) or the way in which the syllabus should be covered. ICSA likes to see a strong local flavour given to a course. (ICSA, 1995)

The General Dental Council (GDC) issues recommendations concerning the dental curriculum and requires institutions to provide information about the courses of study and examinations for its degrees and licences. Similarly, The General Medical Council's (GMC) Education Committee's *Recommendations on Undergraduate Medical Education* determine the general form and content of undergraduate curricula but within these broad guidelines each medical school is expected to develop its own individual curriculum and arrangements for assessment, although major changes must be communicated to the Committee for comment.

Many PRBs do not specify a syllabus as such, but indicate the kind of things that ought to be included in an institution-designed syllabus.

> We identify the sorts of competencies people need. We require them to have the 'under-pinning knowledge' in order to work at a particular level. In terms of a syllabus that would dictate what people read and hours spent on certain things. We do not specify a syllabus in the way other awarding bodies might. (CCETSW, 1995)

Similarly, UKCC has enabling legislation that empowers it to specify length and levels of programmes, exit qualifications, indicative content, outcomes and so on. No detailed syllabus is provided by the Council but specific curriculum advice is given by the National Boards for Nursing, Midwifery and Health Visiting.

> We have a set of outcomes, for example for a registered nursing programme. It is not the Council's business, but that of the National Boards, to ensure that individuals meet those outcomes through the approval of programmes and institutions. (UKCC, 1995)

Sometimes indications about course content are indirect. The Royal College of Midwives (RCM) does not have direct input into courses run in higher education institutions but advises the Department of Health about the content of midwifery courses. Institutions can approach the RCM if they would like some input about syllabuses. However, it is only the UKCC that has the statutory responsibility for establishing the standard and content for nursing midwifery and health visiting programmes. This is not a responsibility of the Royal Colleges.

The Chartered Society of Designers does not specify a syllabus at all but in assessing candidates for full membership, requires them to display specified competencies:

> We're looking for competence, personal qualities, an understanding of professional and ethical responsibility, practice as a designer and professional work experience. Competence I take as including both technical ability and knowledge. We have a checklist for assessors which enables them to think about a number of the different issues that need to be considered, as well as guidelines. It's a fairly rigorous procedure, but it's a face to face examination with work rather than sitting down to an exam. It takes about forty minutes. (CSD, 1995)

Professional bodies tend to be more prescriptive about the content of the professional level than the initial education. The British Psychological Society, for example, has a direct input into courses it examines, such as the Diploma in Clinical Psychology, but makes no direct input into university undergraduate courses. Similarly, the Law Society, although moving away from tight prescription of courses, retains far tighter control over the content of the professional qualification than the undergraduate law courses. At the undergraduate level, the Law Society has specified curriculum requirements that covered about half the content of the degree.

> The problem has always been the slight dichotomy, does the university on the grounds of academic freedom, do its own thing? Can it offer its own programme, or is the curriculum to be dictated to a significant extent by the professional body? Our view is quite straightforward.... What we are saying is: if you wish to practice as a solicitor you must have shown ability, i.e., passed, in the...foundation subject areas, and one or two basic skills as well. And that goes back to our responsibilities to the general public as laid down in the statute. (LS, 1995)

For students with a non-relevant degree, the Common Professional Examination (CPE) offers a conversion course, where the Society rather more closely specifies the content. The professional level, the Legal Practice Course is heavily prescribed by the Law Society both in terms of content and structure of assessment. The course includes:

> a knowledge-base in relation to specific subject areas that are most commonly used in practice; subjects such as conveyancing, wills and probate, litigation, business law. In addition to that there is much more of a skills-base to the course as well, based on five skills; legal research, advocacy—the oral skills, interviewing, negotiation, and so on. There is a separate assessment of each skill, so that each of the five skills is usually assessed twice. There are 6 subjects, the four compulsory and two options. All are assessed both by in-course assessment and by final examination. (LS, 1995)

Despite the differential prescription at the professional and initial levels, there is a tendency for professional bodies to adopt a more flexible approach. Indeed, there is growing criticism of overly prescriptive PRBs, notably in such fields as radiography. Too much prescription is not seen as beneficial to the development and future of the profession. In Australia, the involvement of professional bodies in the design and content of the curriculum is now under investigation by the Higher Education Council. University academics have found it increasingly difficult to be innovative within the curriculum because of restrictions laid down by external professional associations (Maslen, 1995) .

Contrary to the 'myth' of protecting standards, tight prescriptive control of supply actually undermines standards because of the lack of room for intellectual development of the area and because of the stultifying impact on the student experience. For example, professional bodies that insist on a single-honours, traditional route to gaining professional status disadvantage students on modular schemes who want to adopt an alternative approach (Harvey and Mason, 1995, p.38).

Curriculum development

Some professional bodies are committed to curriculum development. This ranges from periodic review, through incremental change and local variations.

ACCA provides an example of a periodic review of the syllabus:

> We had an existing syllabus that I think had just grown up historically, it was just a product of several layers of syllabuses which we assumed for no good reason was the body of knowledge you needed to be an accountant, theoretically. Now we thought we'd find out what accountants do need to do in order to be professional accountants. So we undertook a competency study, which interviewed accountants at work and their employers and students and we mapped all the competencies of accountants. We then mapped that on to our knowledge requirements. So we actually compared that to our existing syllabus and that led to changing the syllabus. We dropped bits and pieces that we didn't need but which are traditionally in accounting syllabuses and we added bits that we think accountants do need that weren't in the syllabus. So, it's basically an employment syllabus now and it's aimed at producing people who can actually do the job of accountants. We started that in 1989 and the new syllabus started in 1994. I think we're committed to updating the syllabus every 5 years on the basis of the competency study. (ACCA, 1995)

Although constrained by the statutory requirements of the regulatory body (the UKCC) the Royal College of Midwives (RCM) expects flexible delivery of the curriculum to reflect local variations:

> The role in curriculum development is to ensure that the content and standard of the education is such that the midwives are able to practice midwifery, but also have the urge to continue developing their knowledge. Midwifery programmes have got to be contemporary, they must meet the needs of the population. The programmes must also meet the needs of the midwives, an esoteric programme cannot be produced simply because it is felt to be useful. It must meet the needs of the women and their families. There is a general curriculum with identified standards, however, working in an area such as Yorkshire, there may be particular local aspects of that area which would be valuable to include within the curriculum. These aspects may not be relevant for another part of the country. We need therefore, to enable midwives to develop a broad view of midwifery and the social/psychological and physiological elements which underpin midwifery practice. The core preparation for all midwives is the same and other elements of the curriculum should reflect the National and local needs. (RCM, 1995)

A major issue with curriculum development is the ever-present temptation to expand the syllabus. There tends to be an incremental inclusion of new material, which is rarely matched by the removal of elements from the syllabus. Despite its 'arms-length' approach to undergraduate education, the

Law Society, for example, has marginally increased its core requirements by including European Law. Even major overhauls, such as the ACCA review described above, tend to result in an expanded syllabus.

> The only problem [with the review] is that the syllabus is just too big, academics want to keep absolutely everything, but that's just life. (ACCA, 1995)

The influence exercised by PRBs over curriculum content and syllabuses is designed to ensure that professionals develop specified knowledge and abilities to enable them to be effective practitioners.

Reflective practitioner

The *QHE* research suggests that PRB involvement in the curriculum is not so much geared towards maintaining the 'mysteries' of esoteric knowledge but in developing effective practitioners. This is evident in the continuing development of the curriculum and attempts by most professional bodies to ensure that they adapt to changes. This is evident in attempts to address outcomes and NVQs and the Europeanisation of syllabuses (see Chapter 6). More importantly, many professional bodies now recognise that initial education must be broader than that required for entry into a the professional stage. With increasing numbers of people entering higher education and relatively fewer opportunities for graduates to practice, or even enter, a profession, the initial stage of professional education should also provide a general education. The Law Society, for example, has adopted this philosophy and is reducing the prescriptive element of initial education.

> Although it may not always seem that way to those teaching on law degrees, the role of the Law Society in relation to course content is and must be minimalist. Not all law students will go on to a professional career, and with the recent expansion of higher education whilst the number doing so may remain constant the proportion that number represents of the total population of law students will fall. This can only serve to emphasise the necessity of a minimalist approach. (Randall, 1994)

The question remains, what makes an effective professional practitioner. Six elements might be identified:

- a body of basic or *core knowledge*;
- *ability to research* or locate additional knowledge;
- the assimilation of appropriate *professional values* and ethical practices;
- a range of *transferable skills* relevant to the practice of the profession;
- a willingness and desire to *continue to learn* and develop skills and abilities;
- an ability to *reflect* on and develop practice.

For example, in the review of legal education a consultation document produced by the Lord Chancellors Advisory Committee (1994, p.8) describes the nature of the knowledge students should acquire and the development of the student in the following terms:

> it requires an active process which promotes the general powers of the mind, enables students not merely to know or know how but to understand why things are, and how they can be different, to relate ideas in one subject to those in another and to develop a questioning approach... '

This closely reflects the 'reflective practitioner' model of professional education (Schon, 1982, 1987). It is, in effect, what the Law Society refers to as the 'reflective undergraduate model'.

> What we would expect from anybody who has done a good quality undergraduate programme is to have good research and analytical skills and to retain an open mind and be able to come to reflective conclusions based on an analysis of the subject matter. (LS, 1995)

The reflective practitioner model relates to specific problems of producing effective practitioners in professional domains. For Schon, it is knowledge-in-use that characterises the professional. Knowledge-in-use involves a body of 'know-how' and a range of strategies and techniques. How-

ever, it is more than 'competence' it also involves:

> the capacity to think creatively in context and the abilities to apply formal knowledge, all of which can be combined at will and called upon in order to produce effective action. It is a kind of real-time reflective thinking; not reflection after the event, but reflection during the event. It is reflection as an integral part of the event. (Barnett, 1992, p. 185)

The reflective practitioner, is not only able to weigh up alternatives in practice but to 'create in her imagination different possibilities, without putting them into effect in the real world' and 'assess them in her imagination, weighing up alternative courses of action and evaluating them against criteria of different kinds'. (Barnett, 1992, p. 185). In practice, there are rarely simple answers to simple questions and as such professionals need to be able to formulate effective action based on an appraisal of insufficient evidence (Birch, 1988; Harvey, 1994). The reflective practitioner thus has to be prepared to modify or abandon some problem formulations and attempted solutions, which requires a continuously self-critical approach. [9]

Effective professional education, Schon argues, should build-in knowledge-in-use as an integral element of the curriculum. This requires a particular focus on content, that is, on developing student abilities rather than prescribing knowledge content. The development of abilities must include 'high-level' skills of critique, analysis, interpretation and so on as well as basic competencies. Barnett (1992, p. 187) argues that the more professional bodies define precisely the capacities and 'competencies' that graduates of approved courses should possess, the less likely they are to 'reduce the openness of the experience' in which students might develop critical abilities.

Summary points

- Professional and regulatory bodies are concerned with the content of both initial and professional education and training. They need to satisfy themselves that the programme of study equips successful students with the knowledge and ability to progress into the profession.

- There are various approaches to specifying syllabus content. In some cases the professional body 'owns' the syllabus or provides a model syllabus. However, many PRBs do not specify a syllabus but indicate the type of content or outcome competencies.

- Professional bodies tend to be more prescriptive about the content of the professional level than of initial education. However, there is a tendency for professional bodies to adopt a more flexible approach to course content at all levels.

- Some professional bodies are committed to curriculum development. This ranges from periodic review, through incremental change to local variations on a national curriculum. A major issue is the ever-expanding syllabus.

- The *QHE* research suggests that PRB involvement in the curriculum is not so much geared towards maintaining the 'mysteries' of esoteric knowledge but towards developing effective reflective practitioners.

Chapter 4
STANDARDS

Concern for standards is at the heart of professional body involvement in higher education. As we saw in Chapter 2, there is a tendency towards more flexibility in the content and delivery of the curriculum. The most important contribution of professional bodies is specifying and monitoring standards—it is also becoming an increasingly complex operation given the shift away from traditional forms of course delivery and assessment.

Most professional and regulatory bodies have maintenance of standards as part of their basic rationale, indeed this is often a statutory responsibility. The UKCC, for example,

> exists in the context of the *Nurses, Midwives and Health Visitors Act* of 1979 and 1992...our function under the Act is to establish and maintain standards of education and training for nurses, midwives and health visitors both leading to and beyond registration. (UKCC, 1995)

Even where there is no *mandatory* involvement of a PRB in standards setting, their involvement is increasingly important as more institutions open their doors to the scrutiny of their participants, consumers and partners. The Confederation of Tourism, Hotel and Catering Management (CTHCM), for example, has as:

> its principal aim to set and maintain standards of education through the provision of course syllabuses and examinations, designed by experts in their field, to reflect the requirements of the industry. (CTHCM, 1995)

Defining 'standards'

Standards is a word often used by stakeholders in higher education but rarely defined. Drawing on debates within higher education, three areas of activity, to which standards relate, can be identified (Harvey, 1995). These are:

- academic standards;
- standards of competence;
- service standards.

*Academic standard*s measure ability to meet specified level of academic attainment. In relation to teaching and learning this refers to the ability of students to fulfil the requirements of the programme of study, through whatever mode of assessment is required. This usually involves demonstration of *knowledge* and *understanding*. Implicitly, other skills are assessed, such as communication skills. Sometimes 'higher level' skills, such as analysis, comprehension, interpretation, synthesis and critique are explicitly assessed. The Higher Education Quality Council (HEQC), for example, uses the following as a working definition:

> explicit levels of academic attainment that are used to describe and measure academic requirements and achievements of individual students or groups of students. (Brown, 1994, p. 24)

In relation to professional education, setting academic standards and ensuring that candidates achieve them, is necessary to reassure the public that the practitioner has attained a level of knowledge sufficient to ensure that they can act effectively.

For research, academic standards are less precise and usually imply the ability to undertake effective scholarship or produce new knowledge, which is assessed via peer recognition.

Standards of competence measure specified levels of ability on a range of competencies.

Competencies may include general transferable skills required by employers; skills required for induction into a profession; and academic (or 'higher level') abilities, skills and aptitudes implicit or explicit in the attainment of an award. These may be stated or inferred in taught course objectives or be a part of the expectations of competencies to be achieved by research students. In the context of professional education, standards of competence refers to the ability of the practitioner to *apply specific skills* and abilities according to occupational or professional criteria. Where competencies focus exclusively on 'higher-level' skills, standards of competence are less easily distinguishable from academic standards.

Service standards are measures devised to assess identified elements of the service or facilities provided (that is, what the student can reasonably expect from their higher education institution). Such standards may include turnround times for assessing student work; maximum class sizes, frequency of personal tutorials; availability of information on complaints procedures, time-lag on introducing recommended reading into libraries, and so on. Benchmarks are often specified in 'contracts' such as student charters. They tend to be quantifiable and restricted to measurable items, including the presence or absence of an element of service or a facility. *Post hoc* measurement of customer opinions (satisfaction) are used as indicators of service provision. Thus, service standards in higher education parallel consumer standards.

Recent research by the Higher Education Quality Council (Brown, 1994, p. 27) suggests that the major professional and regulatory bodies appear to use the term 'standards' in four ways:

- 'the level of achievement that is acceptable to the professional or statutory body, the profession at large and the public. This may be referred to as the *degree of excellence required for a particular purpose*;
- 'the *attainment of specified competencies*. This refers to the knowledge, skills and values that must be demonstrated before the award of an S/NVQ;
- 'the requirement for procedures and practices to conform to *British Standards and European Directives*';
- acceptable professional conduct, values and ethics.

Most PRBs use standards in the sense of the first of these but those involved with S/NVQs use standards in both the first and second senses (Brown, 1994). These parallel the 'academic standards' and 'standards of competence' definitions above.

The use of standards in the third sense has more obvious relevance to certain professions (for example, those in the construction industry) and to statutory bodies. However, for many professional bodies the 'European dimension' is likely to become increasingly important in the next decade (see Chapter 6).

Standards expressed in terms of acceptable professional practice, including clear statements of values and ethics, is a dimension stressed by professional bodies. Both the conformity to external national and international standards, and the specification of professional values and ethics are elements that need to be incorporated into professional education (where applicable) and service standards should be clearly specified to ensure that they are incorporated.

In the main, professional and regulatory bodies do not set service standards, but they may monitor them through accreditation and validation procedures (see Chapter 5). [10] Occasionally they examine resource allocation as a proxy for service standards:

> In practice, it is inevitable that [the Law Society] goes a little beyond a simple specification of that which must be studied. Sadly, it is all too often necessary to go some way towards defining the minimum resources necessary to deliver the desired outcome. In this context there are very real concerns that the Law Society has. (Randall, 1994, p. 33)

Initial and professional standards

In the main, professional bodies approach the standards of initial education differently from the way they approach standards of professional education. For many professions, initial education is a stepping stone that ensures all entrants to the professional stage start with the same basic knowledge and appreciation of the profession. What they are concerned with is the identification of minimum standards required from 'initial' education to allow a student to enter the professional stage of education and training, as for example, in the case of the Law Society:

> Our concern is simple. We need to be able to ensure that those who commence the Legal Practice Course have achieved a minimum level of knowledge and understanding that is sufficient to enable them to cope with the course. To put it another way, the Law Society's definition of its requirements at the undergraduate stage are no more than is necessary to define the common starting point that will be assumed by those designing the syllabus for the [professional-level] Legal Practice course. (Randall, 1994, p. 33)

But even here, the control and assessment of standards is very much in the hands of the educational provider, which, once accredited by the professional or regulatory body (see Chapter 5), is the arbiter of standards, subject to such peer review procedures as external examining or periodic review by the PRB.

At the professional level the concern with standards is much more closely specified. The professional body, in some cases exercises what it sees as direct control over standards through the setting and marking of examinations. For example, ACCA determines standards through a process of exemptions for those pre-qualified, but with a limit that ensures all candidates take a minimum of four professional examinations controlled by the professional body.

Threshold standards

The Higher Education Quality Council (HEQC, 1995a, p. 2) has suggested that 'debate about the desirability and feasibility of establishing "threshold standards" for undergraduate degrees has emerged onto the national agenda'. Although involved in standards at both the initial and professional stages, professional and regulatory bodies, in general, are much more comfortable addressing standards in terms of a threshold minimum rather than gradations of standards.

Some professions specify 'minimum acceptable requirements', a 'minimum level of professional education', or 'minimum standards' but, in the main, PRBs do not use the term 'minimum', preferring instead, 'threshold', 'acceptable', or 'satisfactory' when specifying standards. However, 'there is little doubt that the most common understanding of standards amongst PRBs is that of a *threshold level*' (Brown, 1994).

The preference of PRBs for threshold standards coincides with the view of academics in higher education institutions. At the Third *QHE* 24-Hour Seminar, for example, delegates were able to indicate broad agreement about their ability to identify threshold levels of ability and competence. Academics, who worked closely with professional bodies, strongly supported the role of professions in setting standards. However, they clearly preferred this to be at the level of threshold standards. They were of the view that professional and regulatory bodies (PRBs) are equipped to monitor threshold standards, anything higher becomes more problematic (Harvey and Mason, 1995, p. 36).

Setting standards

It is logical that PRBs are involved in setting standards as they are concerned that graduates wanting to enter their professions are capable of the work involved. Currently standards are set by a variety of groups and professional involvement is only legally required when the course in question counts

towards a legally required licence to practice. Two issues arise: how to make standards explicit and where does the responsibility for setting standards lie?

Explicit standards

Higher education in Britain has not been particularly good at specifying how it sets standards. Historically, standards have been established *post hoc* through the mediation of esteemed colleagues at prestigious universities (London, Oxford and Cambridge) who provided legitimation and mutual support for their endeavours (Silver, 1995). This was the basis of the external examiner system and its basic principle has changed little over two centuries as the number of universities has increased.

The approach has allowed standards to remain implicit rather than explicit. This is in clear contrast to approaches in other European countries. In Denmark, for example, the aims and focus and forms of assessment on university courses are set centrally by the education ministry, on advice taken from the higher education sector.

Despite the broadly acceptable notion of minimum or threshold standards in relation to professional body requirements there is little evidence to suggest that professional bodies are more adept at specifying standards than other areas of higher education.

> We need to develop a clearer collective understanding than I believe we currently have of what exactly we mean when we speak of minimum standards. The Council's Quality Enhancement Group is therefore undertaking a survey of graduate standards which will analyse existing work on graduate outcomes and aim to identify both generic and, if possible, discipline-specific standards of attainment appropriate to higher education. The results will feed progressively into the Council's *Quality Assurance Guidelines* as well as into the *Auditors Notes of Guidance*. (Brown, 1994, p. 25)

This view was echoed by delegates at the Third *QHE* Seminar. Academics who teach in the areas of health, medicine, law, accountancy and architecture agreed that, in the last resort, threshold standards related to outcomes, that is, what students can do. In which case, an *explicit* skills and knowledge template, so far conspicuous by its absence, is required to enable threshold judgements about outcome standards.

Many bodies have used other indicators such as content specification and final examination gradings *in lieu* of specifying standards. Requiring or recommending elements of course content, (as was illustrated in Chapter 2) rather than specifying outcome standards is increasingly the norm in initial education.

The standards in professional education have been much more explicit, especially those that are linked to a statutory responsibility to ensure that anyone who qualifies to the enter the profession exhibits a minimum level of knowledge and competence.

The Law Society, for example, specifies:

> fairly detailed standards laid down in black and white. Its not just like the old University of London where they might just give a subject heading and virtually very little else. It's rather like the written standards of NVQ-style of programmes in a way. There is a similarity to that extent, except that there is probably a greater knowledge base on this sort of programme, and of course it is assessed, not in employment but in the providing institution and by the providing institution. (LS, 1995)

Despite these kinds of assertions of explicit, codified standards, there is a growing demand for transparency in the setting of standards and increasing pressure on professional bodies to ensure that standards are explicit (Harvey and Mason, 1995, p.17).

Responsibility for standards setting

A key issue inhibiting the development of explicit standards is the tension between academics and professional bodies over ownership and responsibility for courses located in universities or colleges. Although some professional bodies have statutory duties to set standards, academic staff teaching a course in a higher education institution are frequently resentful of a prescriptive

approach from a professional body. Some academics feel that they are quite capable of identifying the appropriate standards within their own area of work. Many delegates at the Third *QHE* Seminar were of the view that those who were best at setting standards were the producers: the subject specialists within an institution, along with the external examiners (Harvey and Mason, 1995, p.17).

> The essential question is whether and how far it is institutions and their staffs, individually or collectively, which establish the desired kinds and levels of knowledge and so on, which they wish their students to acquire, as opposed to these standards being defined, and indeed monitored and redefined, outside higher education. (Brown, 1994, p. 25).

This tension is heightened by what academics perceive as the threat of standards being set and imposed by external bodies. There is concern that an approach, similar to the 'lead bodies' within the NVQ system, might be imposed on higher education (Harvey and Mason, 1995). [11]

Professional bodies in many areas (with the notable exceptions of medicine and dentistry) are less involved in standards setting, particularly in relation to initial education, where the specification of explicit standards for initial education has effectively been delegated to the higher education institutions that provide accredited courses. There is a rapid shift towards more explicit aims, objectives and related forms of assessment within degree courses in the wake of external quality monitoring.

Delegation of responsibility is also occuring at the professional level especially in those areas, such as nursing, midwifery and podiatry, where professional status is increasingly being linked to a university degree. The Society of Chiropodists and Podiatrists used to offer, through an examined syllabus, a Diploma in Podiatric Medicine but that has been replaced by B.Sc. degrees in podiatry in universities and colleges, which it validates through periodic vists and attendance at institutions' validating events. The professional body has shifted from direct control of the standards to involvement in quality monitoring, delegating standards issues to the institution and its external examiners. Nonetheless, there is concern that the entrance criteria to some professions are obscure and sometimes 'subjective' (Harvey and Mason, 1995, p. 41).

The development of a degree in nursing is a prime example of the tension between academic standards and standards of competence. There is a culture clash between academics, in medical departments, and practitioners. The academics question the academic status of courses which have only 5 'O' levels (grade C or above) as an entry requirement and which have, in their view, a suspect academic content. For example, Barbara Banks, professor of psychology at University College London, is reported as asserting that the present training structure for nurses lacks academic rigour and credibility and is in urgent need of review. Nurse teachers are criticised for having insufficient grasp of academic disciplines, such as the biological sciences, to ensure that students receive a training thorough enough for their qualifications to command the kind of status envisaged by Project 2000.

> It worries me, too, that because we now call nurse teachers university lecturers they will feel capable of teaching everything themselves, and we will then have lost the potential for contributions from higher education to improve academic standards in the training. (Banks quoted in Tysome, 1994, p. 7)

Conversely, practitioners stress the importance of measuring competencies and recognising the value of practical experience. The National Foundation of Educational Research, which concluded that the introduction of the new courses had proved a success, remarked that:

> in some centres [of nurse training] there has been an overemphasis on areas like biological sciences, because at some universities that was the only experience they had of determining levels of educational preparation. (Tysome, 1994, p. 7)

The English National Board for Nursing, Midwifery and Health Visiting say it is more important to keep sight of what a course is trying to achieve in terms of professional competence than its academic kudos.

The issue, for many academics, is about autonomy and control over the disciplines linked to health. Banks argues that 'the changes are threatening univsersities' control of the courses for

which they are responsible. Nursing schools have been merged into large conglomerates which are trying to impose their own policies and standards on higher education. Furthermore, the English National Board for Nursing, Midwifery and Health Visiting interferes too much in issues such as recruitment and course content:

> the ENB has a dead hand in all this. For instance girls with decent degrees from our department have been turned down for places on nurse teacher training courses because they did not have the appropriate ENB clinical certificates, which represent about a tenth of the content of an honours degree....Also, our local ENB officer has said our course contains too much biological science. My reaction to that is, "how dare they?" They are our qualifications, and we are the ones who must say whether they are up to standard. The ENB should not be allowed to dictate to higher education institutions how to evaluate students. (Tysome, 1994, p. 7).

Even where a professional body has no direct involvement in standards, there remains, in some cases, a desire to influence them through whatever routes are available. The Institute of Biology, for example, used to offer a 'graduate examination' the standards of which they set and controlled. The changes in higher education has led to the phasing out of the qualification and the Institute now seeks a wider role in relation to standards. They percieve, rightly or wrongly, that they no longer have a standards-setting function.

> We would like to have a wider role but at the moment we cannot, as an Institute, directly influence the Higher Education Funding Council or the Quality Council and play a part in setting standards. We can only influence indirectly by getting our members onto various panels. (IoB, 1995)

Assessment of standards

Setting standards is one thing, monitoring and assessing standards raises another set of issues. Professional bodies have a vital part to play not only in setting standards but in reviewing standards and establishing that the standards set have been achieved. PRB involvement in the assessment of standards is mainly limited to professional education and training. Assessment of standards in initial education is often delegated to the institutions offering courses, in the same way as the setting of standards, and mediated by external moderators or examiners.

However, in some areas, such as medical education, control over standards of initial education remains very tight. The Education Committee of the GMC may make written enquiries of the universities with medical schools whenever it sees fit, in order to satisfy itself that standards which it sets are being maintained. It normally exercises that power on an annual basis. Furthermore, the Committee may use its statutory powers to visit courses or inspect assessment whenever it chooses and its report, along with any reply by the university is sent to the Privy Council. A similar procedure operates for the General Dental Council, who may periodically appoint visitors to be present at examinations of dental students.

> The Council has power, if it considers that the course of study or examinations of a particular body are not such to ensure that graduates of licentiates possess the requisite knowledge and skill for the efficient practice of dentristy, to make representations to the Privy Council, who may order that the degree or licence shall cease to confer the right to be registered in the Dentists' Register. (GDC, 1994)

Approaches to assessing standards

There are a number of approaches adopted by PRBs for assessing and monitoring standards of professional education. In the *QHE* survey, 34 of the 74 bodies offering professional qualifications had compulsory examinations, and 41 included a compulsory work experience element.

At one end of the continuum is the singular focus on candidate abilities as determined through a centrally set and assessed professional examination independent of the student learning experience. This effectively substitutes the assessment of standards for the setting of standards. In such

cases, there is often no attempt to define the required standards in advance, nor even to specify the nature of courses. Potential recruits to the profession are required to pass an examination which the professional body sets and marks. For example, the National Association of Goldsmiths of Great Britain and Ireland have a compulsory syllabus and examination but does not require enrolment on a higher education course.

The other end of the continuum involves an integrated partnership between professional body and higher education, which involves joint development of curricula, work experience and continuing education. Often, the process is something in between these extremes.

John Randall, (1994), for example, emphasises partnership in legal education but clearly identifies the Law Society as having a junior partnership role in respect of initial education and a senior role in relation to the new Legal Practice course.

The Chartered Institute of Bankers (CIB) assesses standards by two means: monitoring examination results and the use of a network of education officers in regional centres, supported by a central Tuition Services Manager. The education officer in each local centre plays an important role. The education officer is a part-timer, normally a banker whose job it is to make sure the students locally know what provision is available and who acts as a conduit for local needs. The education officers:

> are also meant to be keeping an eye on standards, not to the point, although some do, where they'll go and sit in on lessons because that can be a very difficult thing to handle. But they're available and they're normally fairly senior people with a fair amount of clout who can make thing happen. They're monitoring performance and advising students and helping colleges. (CIB, 1995)

Pass and failure rates at each regional centre are compared to the national average. If there appears to be a problem, the regional education officer is expected to investigate the causes, 'is it a new lecturer, was it a particularly poorly prepared group and where were the issues? That can normally be resolved quite amicably'. In addition, visits to a broad range of institutions are made by officials: 'we try and go to both ends of the spectrum, the good ones to find out why, there maybe some good practice that we can disseminate, and the poor ones just to go in and encourage them, frankly.' (CIB, 1995).

Increasingly, assessment of standards in professional education is being delegated to the provider institutions. The Law Society, for example, although retaining strict control over the Legal Practice qualification, delegates the setting and marking of examinations to the higher education institutions.

> Now that is where the change has taken place very materially. It is the institutions now that are responsible for the delivery and for the assessment of the course, subject to the scrutiny of the monitoring assessment visits and the external examiners. The external examiners are nominated by the institution but actually appointed and paid for by the Law Society. That is another form of quality assurance. (LS, 1995)

Similarly, ICSA, makes use of the external examiner system but requires that the external examiner for the course is a member of ICSA and preferably a local employer. The examiner reports to the professional body as well as the higher education institution.

Comparing standards

Comparability of standards is a notoriously difficult issue that has been side-stepped by the assumption of a common currency of qualification within British higher education. There is an implicit assumption of a 'gold standard' of degree classification in Britain. That is, a degree of a given classification is somehow of a comparable standard across institutions and across subject areas.

However, there is scepticism that, for example, a 'first-class' degree in physics can be equated with a 'first' in fine art, or even that, given diversity of missions, a first in physics at institution A could be compared with the same award at institution B (Brown, 1994, p. 24).

With the rise in multi-subject degrees, modular schemes and varied forms of assessment, it is

difficult to compare the standards of two firsts at the same institution on the same programme of study (HEQC, 1994b, p. 68).

The increasing diversity of a mass higher education system makes it difficult to sustain the idea of a 'gold standard' across the system. It is arguable that the 'gold standard', if it existed, has long since been abandoned and that it only operated in Britain within the context of an élite system tightly controlled by examiners from Oxbridge and London (Silver, 1995).

Many delegates at the Third *QHE* Seminar were doubtful that standards could be compared between institutions. Such comparisons, if attempted, should be within disciplines and possibly limited to courses with similar 'missions' (Harvey and Mason, 1995, p. 19).

> But even if strict comparability were feasible, the attachment to diversity makes one question as to whether it would be desirable. Nevertheless the Committee of Vice-Chancellors and Principals and the HEQC Board have formally accepted that we should try to establish and protect threshold (that is, minimum) acceptable academic standards (Brown, 1994, p. 24)

As discussed above, professional bodies (as well as many academics) are relatively confident of identifying threshold standards but less confident in going beyond that to specifying degrees of competence. The transition from initial to professional education is, in the main, based on the attainment of a threshold minimum. Comparability of standards across institutions and across national boundaries (see Chapter 6) would, therefore, be better targetted at the threshold level rather than at degrees of excellence.

The threshold approach also applies at the professional level, with the aim of producing 'employable' professionals with a minimum (but enhanced) level of professional knowledge and expertise and a set of professionally relevant competencies and values. If the reflective practitioner model is to be taken seriously, professional education also adds a unifying approach, encapsulated in critique and reflection, to ensure *effective* practice. [12]

An alternative approach would be to abandon the notion of comparability of standards across the system. Academic audit and the assessment of teaching quality are linked to the mission of the institution (see Chapter 5) and judgements, in principal, are linked to the extent to which the quality assurance system or quality of teaching fit the purpose for which they have been designed. The same approach could be applied to standards. Instead of national comparable standards, each institution could set the standards that relate to its mission. Comparisons, if possible at all, would be limited to those institutions that had similar missions. Monitoring of standards would then shift from making comparisons across institutions and focus on the ability of the institution to provide the standard of service claimed in its Student Charter and to produce the level of student attainment set out in its mission statement. [13]

However, such a focus would require a clearer specification of student outcomes than provided by the traditional degree classification. The logical outcome of this may be an abandonment of degree classifications in favour of student profiles of attainment, which more closely detail skills and abilities as well as knowledge.

The development of higher-level NVQs, with the emphasis on criteria-referenced competencies and abilities, further undermines the need for comparability of 'academic standards' and replaces them with attainment of competencies, linked to national standards (see Chapter 7).

Irrespective of whether comparability within a diverse system is possible, the call for comparable academic standards, from all quarters, has increased following the fusing of the old and new universities into one sector, the widening of access to higher education, and the internationalisation of qualifications. The reasons proposed for comparability include:

- students and potential students and their parents or employers want to be reassured that they will receive at least an adequate education at the institution in question, and that standards for similar awards and comparable programmes do not differ excessively between institutions;
- employers want the work-based qualifications of their employees to be of a 'recognised' standard;

- government and other sponsors have basic value-for-money concerns—the Government wants to ensure that public monies paid into the university sector fund the highest 'standard' of education;
- potential collaborators (other institutions, including institutions in other sectors or overseas, companies, professional bodies) want to be reassured that the institution has standards which will make it a worthwhile and reputable partner in devising, delivering and assessing joint programmes and awards, in belonging to a network for exchanges of information or personnel, or in co-operating in some other way (Brown, 1994, p. 25).

Even so, some academics argue that monitoring of academic standards by external bodies, be they professional bodies or government agencies, impugns the integrity and autonomy of professional academics. The external examiner system is sufficient to ensure adequate and comparable standards at all levels.

Others are more sceptical, arguing that higher education cannot be left to monitor standards because there is an evident drift in standards as a consequence of value-for-money pressures. Furthermore, the external examiner system can no longer effectively control and compare standards given the diversity and expansion in the higher education system.

External examiners

External examiners are finding themselves in an increasingly difficult position as guardians of standards. Some doubt was expressed by delegates at the Third *QHE* Seminar, as to whether they could adequately fulfil the expectations laid upon them.

It is by no means clear that external examiners have the breadth of experience to assert a true knowledge of the 'gold standard' (if such exists). Indeed, there is a possibility that some externals might merely be drawing upon their own views of what the appropriate standards are. It was also suggested that external examiners were 'banded' within the system, with institutions tending to select externals from institutions with similar missions or profiles.

The external-examiner system is under a lot of strain and there is a concern that peers are no longer able to perform a comparative service, especially on modular schemes. However, it was felt that the peer approach, be it in the form of professional body assessment, is still the best available form of monitoring threshold standards.

The recent review of external examiners, which the Open University's Quality Support Centre has undertaken on behalf of HEQC (Silver, Skennett and Williams, 1995), shows that there is extensive support for, and usage of the external examiner system from both academics and professional bodies . There is no significant support for abandoning it. It has worked effectively and, despite unprecedented pressure and imperfections, can continue to work if suitably adapted. The report illustrates the variety of ways in which the external examiner system is used across the system. It suggests, among other things, that:

- there is strong institutional support for the continuation of the external examiner system (a view supported by the professional bodies consulted);
- the system should be strengthened to ensure its effective operation as a genuinely national system;
- the purposes, focus and functions of the system need to be re-affirmed or re-formulated in the light of recent changes in higher education;
- national guidelines for good practice should be developed, which should include appointment practices, induction, briefing and reporting arrangements;
- the relation between external examining and other forms of external quality monitoring should be clarified.

All of this points to the continuation and strengthening of a national external examiner system alongside other forms of quality monitoring. Traditionally, the external examiner system, along with internal examining 'is a non-intrusive, outcome-oriented mechanism for verifying and supporting high quality and standards in programmes of awards. As such, it has played a vital role in ensuring public confidence in UK higher education both at home and overseas' (HEQC, 1995a, p. 2). It appears that professional bodies are increasingly willing to adopt the external examiner system as the mechanism for maintaining standards and this is likely to become more important as the professional bodies make more use of higher education provision for professional education.

Declining standards?

The changes in higher education and the focus on fulfilling specified objectives make assessing and monitoring standards more difficult. Yet, comparisons over time, usually unfavourable, are often made by representatives of professional bodies, who feel that in some respects standards have fallen. Indeed in the recent HEQC progress report on *Graduate Standards* the concerns of PRBs with regard to the standard and variability of graduate output is noted (HEQC, 1995b, p. 2).

In Engineering, there is a feeling that standards have fallen. The Engineering Council has produced *Competence and Commitment*, which argues for the requirements for a chartered engineer to be raised from a B.Eng. to an M.Eng.:

> There are many factors which lead one to believe that the standard of the graduate output has decreased over the last 10 years...It's impossible to assess, it's just knowledge of the type of person which is being produced now compared with the type of person being accredited since 1978. (IEE, 1995)

However, other commentators, particularly staff in higher education, have viewed these proposals as damaging to the engineering profession:

> The whole document is rather a sensitive issue. Attempting to dictate entry levels could discourage people from becoming engineers and goes against the trend of wider, freer access to higher education (Wade, 1995).

Certainly, the diversity in higher education makes it more difficult to monitor standards. For example, in accountancy:

> it's all been quite difficult to know what standard everybody's qualifications are at...My impression has been that there has been a huge pressure on higher education to lower its standards. That's just anecdotal but the examiners pretty much agree with that.... I think all the professional bodies are under pressure to lower their standards as well. The DTI have just accepted a qualification from another professional body, which we consider is most certainly at an intermediate stage, but they've accepted them under the *Companies Act* as auditors. So there is pressure everywhere to make things easier. (ACCA, 1995).

Similar concerns are expressed by the Law Society who are concerned about coherence, and by the IEE who express some concern about the rigour of modularised assessment.

> We are worried about the trend to modularisation. There is nothing wrong with courses being offered on a modular basis. However, there must be a recognition that considerable resource is needed, not least in the counselling of students, to ensure the coherence of the resulting modular course. (Randall, 1994, p.33)

> Very many courses are going modular. This means that the assessment process is moving away from the standard end-of-year examination to monthly or module assessments and continuous assessments. There's nothing wrong with that process as long as there is a rigorous process... There is an increasing continual assessment element as opposed to the rigorous process of examination. (IEE, 1995)

This concern about examination performance may be justified but possibly irrelevant. The nature of learning in higher education is changing and examinations no longer represent an effective way of assessing that learning. The high quality of final year projects is perhaps indicative of the development of new sets of abilities and skills . Projects are an essential element of engineering assessment, and 'in fact they are exceedingly good in many places' and, furthermore, institutions are very rigorous in assessing them (IEE, 1995).

Thus, the use of examination performance as an indicator of changing standards may be an inappropriate indicator given the gradual shift from teaching of a knowledge base to a learning-oriented development of an effective practitioner (even at the undergraduate level).

Summary points

- Concern for standards is at the heart of professional body involvement in higher education. Most professional and regulatory bodies have maintenance of standards as part of their basic rationale, indeed this is often a statutory responsibility.
- 'Standards' refers to three areas of activity: academic standards, standards of competence, service standards.
- In the main, professional bodies approach the standards of initial education differently from the way they approach standards of professional education.
- Minimum standards are required from 'initial' education to allow a student to enter the professional stage of education and training and control. At the professional level the concern with standards is much more closely specified.
- The involvement of PRBs in setting academic standards in initial education frequently takes the form of specifying elements of course content, rather than outcome standards. Standards setting in professional education is often more rigorous and oriented towards professional competencies as well as knowledge.
- PRBs adopt a range of procedures for assessing and monitoring standards ranging from a centrally set and assessed professional examination to an integrated partnership approach, which involves mutual development of curricula, work experience and continuing education.
- Increasingly, assessment of standards in professional education is being delegated to the provider institutions. The shift is thus from control of standards through direct input, to indirect monitoring of standards.
- There is scepticism about the possibility of comparing standards across the system and a growing preference for assessing provision against explicitly stated aims, objectives and purposes.
- There is considerable support for, and usage of, the external examiner system in the monitoring of standards.

Chapter 5
QUALITY MONITORING

Quality is a key issue in post-compulsory education and there is a strongly supported view, within higher education, that professional bodies should continue to have a role in monitoring the quality of initial and professional education. Academics working in the areas of health, medicine, law, accountancy and architecture are of the view that PRBs play a positive role in influencing quality and that professional bodies provide an element 'of much needed reality' in the academic process (Harvey and Mason, 1995, p. 40).

Not all professional bodies agree. Some argue that they need no role beyond accreditation, as quality monitoring is the function of the institution.

> I don't think as a professional body we have any particular expertise in the quality control of other people's courses. They have quality mechanisms. Presumably they report to their university institutions, and maybe if things go wrong they report to a government department eventually. Ideally, we rely on their quality control mechanisms. So, once we've looked at the syllabus and once we've looked at the general facilities of the course, I don't think that we've got a legitimate place really to go round telling other people how to do their job. (ACCA, 1995)

Defining 'quality'

Higher education is characterised by considerable ambiguity and confusion about what is meant by 'quality' and 'standards'. The two terms are often ill-defined and used in overlapping ways. Sometimes quality is used to infer academic standards, as for example, when it is used in the sense of 'excellence', sometimes quality incorporates the notion of service standard.

This confusion is mirrored by the professions. Few of the PRBs involved in the recent HEQC survey (Brown, 1995) 'had a succinct definition of quality' and tended to conflate it with standards. Most saw quality in terms of:

- guaranteeing an acceptable and identifiable standard; or
- establishing fitness for purpose; or
- establishing fitness for practice (or to practise).

In previous *QHE* publications we have suggested that quality is a term used in five broad and partially overlapping ways in higher education (Harvey and Green, 1993):

- quality as exceptional;
- quality as consistency;
- quality as fitness for purpose;
- quality as value for money;
- quality as transformation.

The *exceptional* approach makes the traditional link between quality and 'excellence', usually operationalised as exceptionally high standards of academic achievement. Quality is achieved if the standards are surpassed.

Quality as *consistency* focuses on process and sets specifications that it aims to meet. Quality in this sense is summed up by the interrelated ideas of 'zero defects' and getting things 'right first time'.

The *fitness-for-purpose* approach judges quality in terms of the extent to which a product or service meets its stated purpose, be it one defined to fulfil customer-defined requirements or institution-defined mission.

Value for money assesses quality in terms of return on investment or expenditure. At the heart of the value for money approach is the notion of accountability. Public services, including education, are expected to be accountable to the funders. Increasingly, students are also considering their own investment in higher education in value-for-money terms, an aspect particularly relevant to professional education.

Transformation sees quality as a process of change, which in higher education adds value to students through their learning experience. Education is not a service for a customer but an ongoing process of transformation of the participant. This leads to two notions of transformative quality in education: enhancing the consumer and empowering the consumer. There is a tendency, as explored in Chapter 2 for professional education to embrace the notion of transformation in relation to the development of the reflective practitioner. In this model, students are not only enhanced through a process of added value in terms of knowledge and skills but are also empowered, through critical reflection, to be effective practitioners.

Indeed, in educational terms, excellence, consistency, fitness for purpose and value for money could all be seen as operationalisations of transformation. Arguably, none of them is adequate alone because none capture the added-value of the transformative experience.

Involvement in higher education quality monitoring

There are four ways in which professional bodies become involved in quality monitoring in higher education as distinct from procedures designed to monitor standards (although some overlap);

1. through *accreditation*, licensing or recognition of courses;
2. through the *validation* and review of courses, which may include involvement in institutional internal panels events;
3. through professional body *reviews of institutions*, sometimes leading to accreditation of the institution rather than specific courses;
4. through involvement in *external* quality review, such as those undertaken by the funding councils or the HEQC.

The first three of these are sometimes referred to under the umbrella term 'approval' of courses. Sometimes, professional bodies make no distinction between the process of accreditation, licensing or recognition and the validation and review of the nature and operation of courses. Terminology is often confused and often used inconsistently.

Accreditation

Accreditation is official approval and recognition awarded to academic and vocational awards. Awarding bodies are legally constituted and have authority for awards related to their expertise; for example, NCVQ for NVQs, universities for degrees, and professional bodies for their professional qualifications and chartered status. Some professional bodies also have an obligation to accredit university-based courses. For example, The College of Speech and Language Therapists is obliged by statutory instruments to maintain a register and issue certificates to graduates completing an accredited course. [14]

Accreditation is vital if a higher education institution wishes to run courses that offer awards controlled by PRBs. Accreditation may be of specific courses or, less often, of entire institutions.

CCETSW, for example, accredits courses run by higher education institutions but not institutions

Table 5.1: PRBs claiming to accredit educational institutions

ID	*Name*	*Type*
1	Association of Cost and Executive Accountants	PB
4	British Dietetic Association	PB**
12	Chartered Institute of Marketing	PB
77	Council for Professions Supplementary to Medicine	RB
86	General Council and Register of Osteopaths Ltd	NSRB
80	General Medical Council	RB
35	Institute of Financial Accountants	PB
40	Institute of Legal Executives	PB
56	Mathematical Association	PB
81	National Board for Nursing, Midwifery & HV for Scotland	RB
64	Society and College of Radiographers	PB
82	Teacher Training Agency	RB*
71	The Law Society of Northern Ireland	PB
74	The Royal Institution of Chartered Surveyors	PB
85	Welsh National Board for Nursing Midwifery & HV	RB

PB professional body; RB regulatory body, NS non-statutory
* no register of practitioners ** does not offer a professional qualification

as a whole. Of the 92 bodies surveyed only 15 claimed to accredit institutions (Table 5.1). 74 of the 92 bodies claimed to accredit higher education courses (Appendix 2, Table 4) and 10 bodies placed a limit on the number of the courses accredited (Table 5.2). Of the 74 bodies accrediting courses, all but three indicated that they undertook accreditation through a formal process (Appendix 2, Table 4). [15]

The approach and extent of accreditation varies from the recognition of courses as representing industry standards of training (such as those accredited by the National Council for the Training of Broadcast Journalists (NCTBJ)) to the complex and tightly constrained procedures of the General Medical Council (GMC):

> The Education Committee of the GMC [which is ultimately responsible to the Privy Council] has power to petition the Privy Council to add to the list of universities entitled to award registerable primary degrees in medicine and surgery in the event that new medical schools are established. The Committee would only proceed in this way if it were satisfied that the arrangements for teaching/learning and assessment met the requirements laid down in its *Recommendations on Undergraduate Medical Education*. It would satisfy itself by means of appointing a team to carry out a formal 'visit' (to assess the teaching) and 'inspection' (of the examinations/assessments) over a five-year period, and would only reach a final decision when the first cohort of students had completed the five-year course and the qualifying examinations. (GMC, 1995)

Table 5.2: PRBs claiming to limit the number of higher educational courses accredited

ID	*Name*	*Type*
6	British Psychological Society	PB
13	Chartered Institute of Purchasing and Supply	PB
21	Community and Youth Work Association	PB
22	Confederation of Tourism, Hotel & Catering Management	PB
87	General Council and Register of Naturopaths	NSRB
80	General Medical Council	RB
25	Institute of Animal Technology	PB
50	Institution of Civil Engineers	PB
55	Law Society	PB
61	Royal Pharmaceutical Society of Great Britain	PB

PB professional body; RB regulatory body, NS non-statutory

Validation

Validation, applied to higher education courses, is the process that ensures the intentions and purpose are reflected in the content, organisation, available resources, delivery, assessment and outcomes of the course being proposed or under review.

In the *QHE* survey, 51 of the 92 bodies indicated that they *validate* courses in higher education institutions (Appendix 2, Table 5). Nine bodies awarding a professional qualification did not accredit or validate higher education courses—primarily because the award was based on passing professional body set and assessed examinations (Appendix 2, Table 1).

Validation is closely linked to review and nearly all PRBs who are involved in approval undertake reviews of approved courses and re-visit whenever significant changes are made to such courses. However, reviews are more likely to be periodic and few organisations undertake annual monitoring of approved courses. Reliance is often placed on their formal committee structure, professional networks and branch meetings to alert them to actual or potential problems (Brown, 1995, p. 28).

Although validation and review procedures could theoretically lead to withdrawal of approval this occurs very rarely in practice. Instead, bodies prefer to emphasise the positive developmental and enhancement role of approval and review mechanisms—a finding also reported from the HEQC study (Brown, 1995, p. 28).

Approval procedures

Accreditation and validation, which will be referred to jointly as 'approval' (Brown, 1995) involves a variety of procedures, but the vast majority of PRBs use a mixture of the following:

- exchange of correspondence;
- scrutiny of documentation;
- special on-site visits;
- attendance at internal validation events.

Most procedures requiring visits make use of peer review procedures, and peers are often involved in scrutiny of documentation when that is the principal means of determining approval (Appendix 2, Table 5).

Approval of initial education

Approval of initial education varies from a very 'hands-off' approach based on receipt of documentation through participation in internal validation and review events to a very close scrutiny involving specially arranged visits following the receipt of specified documentation.

The validation of undergraduate degrees by many bodies is primarily through the exchange of documentation and telephone conversations, for example, the Association of Cost and Executive Accountants and the Royal Institute of Public Health and Hygiene (RIPHH, 1995). This is occasionally complemented by attendance at institutions' own validation events.

Others make use of periodic visits such as those conducted by the Architects Registration Council of the United Kingdom, the Chartered Institute of Purchasing and Supply and the General Dental Council. The College of Speech and Language Therapists (CSLT), is indicative of the approach of bodies that have a statutory obligation:

> It is incumbent on CSLT to ensure that certificates are issued only to individuals who have graduated from a course recommended to the Secretary of State. This delegated authority is exercised through a process of peer and expert review, based on periodic visits to the educational establishment and course by a panel nominated by CSLT, and by regular monitoring. This process ensures that satisfactory standards are main-

> tained. Full documentation on the course must be produced in advance of a visit by the educational establishment as a necessary part of the accreditation process. This course document must be sufficiently clear to prevent laying the course or the College open to any negligence charges. Re-accreditation visits will normally take place every five years. (CSLT, 1995)

Some bodies, such as the Chartered Institute of Transport, the Hotel Catering and Institutional Management Association and the Institute of Taxation Incorporated by Royal Charter, link their peer review to institutions' own internal validation procedures.

Some validation processes, although they include visits, are much more discursive than others. The Library Association, for example, emphasises the need for dialogue.

> People from other disciplines when they've looked at how we approach validation events and accreditation of courses, have said: 'Well, I've had dealings with the Engineers, the British Computing Society, Social Work, and we find your approach very refreshing because you do genuinely approach it as a dialogue and a partnership you're not seeking to make everybody play the game by your rules'. And we're not..... We talk when we go on accreditation visits, ...about their research projects and so on. So, the partnership spreads out from this department, other members of the Association are drawn in through this process. (LA, 1995)

The Royal Town Planning Institute, on the other hand, provides an example of a prescriptive 'hands-on' approach to initial education. It provides guidelines for institutions on course content, staffing, library and computing resources, accommodation as well as specifying criteria such as the length of courses (which at undergraduate level is a minimum of four years full-time).

> We allow courses to develop their own aims and objectives: one of which would be a course that seeks to satisfy the Royal Institute. We then provide guidance on what core areas should be covered and the course would have to justify to the accreditation board why something wasn't covered. Some things are non-negotiable, obvious things. We'd expect schools to spend no less than a third of the course covering core subjects. In actuality it's probably more likely half. A third of the time should be spent on specialised subjects so that the students have an opportunity to develop some aspect of planning in-depth, and the other third, some of which may be taken up with core subjects, can be spent on things like language, or options from other departments....We're not prescriptive about the way that things are taught or the order in which all of them are taught but the integrity of the course is crucial, sequencing and coherence are important. (RTPI, 1995)

The documentation required is very detailed. It includes description of the institution, the planning department or school, the courses, the staff, the research going on and other activities such as consultancy. An Accreditation Board, which is a mix of practitioners and academics, read the documentation prior to a visit. A 'pathfinder' visits the institution the day before the accreditation visit to see what has been prepared and to brief the visiting Board. 'Then we have one or two days looking at the coursework, talking to staff, students, local employers, local practitioners, our own branch people—everybody possible.' All of this is evaluated against the 'guidelines' and a recommendation about accreditation is communicated to the institution.

Following approval, the RTPI, maintains close contact with an accredited course through the 'dialogue member' on the accreditation panel. The dialogue member makes an annual report to the the Professional Qualifications Committee of the Institute about changes, developments and so on. 'If it's something major, such as modularisation then they need to seek transfer of accreditation from one structure to another'. There is also a visit halfway between the quinquennial visits. However, the main contact is informal through regular contact with the head of school and via seminars on topics of mutual interest (RTPI, 1995).

A similar, approach is adopted by the professional engineering institutions through their periodic accreditation visits to higher education institutions. These are currently separate visits that review course provision but do not coincide with internal validation and periodic review processes.

The increasing adoption of modular structures by higher education institutions has led, in some cases, to similar accreditation procedures by some professional bodies. The Chartered Institute of Housing (CIH) neither accredits courses nor institutions but, looking to the future,it has chosen to accredit modules within programmes of study. Its own professional qualification has also been broken down into modules, which along with accreditation of modules and distance learning options

has increased flexibility and access to the profession. The Institute recognises that 90% of people remain for three years at one centre. However, the majority qualify through part-time study and the scheme they have developed allows for greater geographical mobility (CIH, 1995).

Approval of professional education

Approval of professional education is similarly varied but PRBs tend to get more closely involved than when validating initial education and to have more closely specified validation processes. For example, in nursing, midwifery and health visiting validation is undertaken by National Boards in each of these disciplines and processes are minutely documented.

The Law Society, similarly, adopts a much more rigorous approach in its validation of the professional course—the Legal Practice Course—than for undergraduate degrees. The Society approval of courses is dependent on acceptable levels of resourcing, closely specified student numbers, and so on.

Once approved, annual assessment visits are mandatory for continued validation. The assessment visit involves between two and eight assessors (depending on the size of the course) visiting an institution for a minimum of three days. The assessment teams include academic peers and practising professional solicitors. The visit includes direct observation of teaching and evaluation of resources:

> We would observe a minimum of about twenty classes in most visits. We would see almost all the teachers involved. We would talk to teachers. We would meet with students. We would meet the senior management of the university. We would assess the quality of the resources generally including; teaching resources, IT resources, the library resources, the resource material used for the teaching of the course, because a lot of it is materials-based, being a very practically-based course. We would also assess the quality of written and oral assessments. We pronounce on its quality and currently we have four grades that we can offer: excellent, good, satisfactory and unsatisfactory. (LS, 1995)

The assessment visit results in the production of a report which goes to the Legal Practice Course Board and to every institution offering the Legal Practice Course. The aim of the assessment visit is 'to *help* the institution concerned, and to agree an agenda to point up issues and move the system forward to improve the quality of the provision'. The aim is not to withdraw validation but to ensure that problems are overcome.

Professional-level accreditation and validation is often more formalised than at the initial stage. For example, the ICSA has a formal collaborative scheme with higher education institutions:

> The accreditation process involves the higher education institution submitting a proposal to the ICSA for their approval. The ICSA then carries out a formal internal validating event. Some relevant undergraduate higher education institution programmes may provide partial exemption from ICSA exams where appropriate. ... Once the course has been validated [approved] a 'Heads of Agreement' contract is issued. This contract is signed by senior staff from the higher education institution and the chief executive at the ICSA. The document lays down all collaborative arrangements and is a monitored document. (ICSA, 1995)

In some instances, accreditation is limited to joint programmes between the professional body and a higher education institution. The Royal College of Midwives (RCM), for example, writes and runs its own programmes. However, it has a joint working relationship with about eight institutions involving joint masters midwifery programmes, which they accredit. Accreditation of courses devised by institutions is outside the remit of the RCM.

Recognition of courses for membership of professional bodies

In some cases, the professional body does not approve a course for an award but recognises courses as a basis for membership. This mainly seems to be done through documentation, based on an application by an institution for the appropriate recognition.

For example, the Chartered Society of Designers (CSD) does not accredit courses but recognises them for membership of the CSD. Institutions write to apply for recognition of courses providing

documentation about the provision. The documentation is scrutinised by a sub-committee that makes a recommendation about recognition. If there are issues of concern arising from the documentation it might be followed up in correspondence or, on rare occasions, in person with a visit, depending on the nature of the issues raised. 'We're reviewing the procedures at present because I think we want to make them a bit more rigorous' (CSD, 1995)

External quality monitoring

Officers from some of the professional bodies are directly involved in the HEFC's teaching quality assessment and the HEQC academic audit. For example, officers from the Law Society were involved in approximately one third of the HEFCE law assessments, although they had little involvement in the criteria upon which assessments are based. [16]

Other PRBs are confined to a consultancy role. For example, the UKCC admits it does not have a direct role but advises, influences and has membership of relevant committees:

> For example,...I am an observer on the joint medical committee for HEFCE for medical dental and nursing education and we also have formal and informal links with HEQC, the other funding councils, and so on. We have just received an invitation from HEQC for a policy initiative to set up quality assurance on health-related programmes within higher education and we've just been asked to nominate somebody for that. It is a strong link and it's getting stronger. (UKCC, 1995)

For some professional bodies the link to external quality monitoring is confined to providing assessors. ICSA, for example, has been asked by the HEFCE to put names forward for assessors and to suggest auditors for HEQC. The Institute of Biology felt that nominating members was regrettably its only contribution to this particular quality-assessment process: [17]

Although CIB's involvement is also through the nomination of assessors, they are rather less interested in being involved as they are satisfied with the quality of university-based courses.

> I've requested papers as necessary and, with the HEFCE council, we have nominated some assessors. But you don't get the feeling now that there are inspections of the part-time professional courses as an entity, which used to be the case in the old days....We have all the reports....The university sector—from experience and observation—the quality is fine. (CIB, 1995)

CIB is far more interested in whether institutions are providing flexible learning opportunities for its potential client group rather than another layer of quality monitoring. CIB are focused much more specifically on the needs of a group of target users, such as whether institutions are providing week-end courses, than they are the more 'remote' overview of quality assurance procedures undertaken by HEQC.

Similarly, although keeping an eye on external quality monitoring, CCETSW has been particularly wary of involvement in teaching-quality assessment processes and claims to have maintained a distance from the recent HEFCE assessment of social work:

> They do actually have 'industrial' assessors— a generic term—and do have people from the practising side. As an awarding body, we originally viewed it as a conflict of interest to be involved. When social work comes round next time in HEFCE process, we would want to review that decision. We always retain the fact that only CCETSW is interested in concentrating on whether a higher education institution has satisfied the specifics of our award. The funding councils are interested in this but only as a by-product. It is our main aim, and our assessment of higher education institutions needs to be very focused. Although we can use material generated by HEFCE, we still need to do 'something'. We have a very definite role. (CCETSW, 1995)

Some professional bodies have little interest or involvement in national external quality monitoring.

> We're aware of it but we're not involved in it. We're assuming that the quality control mechanisms are up to the institutions and their people who are responsible for organising it. But no, we're not involved with any of that. (ACCA, 1995)

Professional bodies have a variety of options in relation to external quality monitoring.

1. They could distance themselves from other forms of external monitoring and carry on much as before.
2. They could make use of the information provided by the other forms of external quality monitoring.
3. They could be proactive in suggesting that they undertake the quality assessment on behalf of the funding councils.
4. They could attempt to synchronise their procedures with those of other external quality monitoring agencies, and in so doing, link into the ongoing quality procedures within institutions.

Each of these options are briefly reviewed below.

Maintaining a distance from external quality monitoring

This is increasingly becoming a non-viable option given the changes in higher education. The Secretary of State is committed to reducing the burden of external quality monitoring on staff in higher education institutions while ensuring processes of accountability. Accountability applies as much to the professional bodies as to the higher education providers. It is not feasible for most professional bodies to ignore this broader context and to imagine that they do not have to address the quality monitoring issue.

Changes in professional education (Chapter 6) that are already beginning to impact on professional bodies also make doing nothing about external quality monitoring an unattractive option. As has been illustrated, for the professional bodies attempting to link their professional status to university degrees , the time for doing nothing has already passed.

Using information from external quality monitoring

Some professional bodies make use of the information available from external quality monitoring. For example, CCETSW receives all reports and requires its own staff to comment upon them. CCETSW reviewed provision at the one institution that received an 'unsatisfactory' grading in the HEFCE exercise to see what action was being taken, that, from its point of view, would need to be implemented. The Law Society, too, was concerned about the unsatisfactory rating in law received by one institution.

ICSA buys reports for any institution that it is interested in regardless of the subject area being assessed 'just to provide a general feel for the institution'. If a higher education institution had received a bad report, and it was a provider of collaborative programmes, the ICSA would ask questions as to what implications this assessment held for their collaborative programme.

Similarly, the Teacher Training Agency (TTA) is interested in a broader picture than just initial teacher training (ITT) as it has a duty to ensure it is funding 'quality' institutions with proper systems in place:

> The TTA does not have a remit to get involved with the detail of what universities and colleges do beyond ITT, but obviously we are concerned because our students study in the wider academic community, that is another reason why we have meetings with HEQC and HEFCE. (TTA, 1995)

A number of professional bodies, including ICSA, get information on the external quality monitoring undertaken by the Funding Councils and the Quality Council through feedback provided by their own members.

The information gleaned from external quality monitoring agencies is not seen as an alternative to professional body processes rather as an additional source of information that might provide a broader context, act as an early-warning signal, or as a check.

Acting as agents of external quality monitoring bodies

It has been suggested that, where professional arrangements exist, the funding councils should delegate the responsibility for teaching quality assessment to the appropriate body (Fraser, 1993). This view has also been voiced in the Lord Chancellor's Review of Legal Education:

> Under the terms of section 70 of the *Further and Higher Education Act 1992*, the Funding Councils are required to secure that provision is made for quality assessment, not necessarily provide it themselves (The Lord Chancellor's Advisory Committee on Legal Education and Conduct, 1994).

There was some initial enthusiasm for franchising from some professional bodies such as the Institution of Electrical Engineers.

> We're talking to the HEQC and the HEFCs. Whilst our processes might not come together with the HEQC's, we are close to the funding council in terms of procedures. It's our hope that the funding council will franchise their processes to the Institutions to do it on their behalf...We still have a long way to go in terms of teasing out the common processes but there are definite moves. We're looking for convergence. (IEE, 1995)

However, it seems that the Institution may be equally prepared to synchronise processes rather than act on behalf of funding councils, an option being developed by some of the other engineering institutions (discussed below).

Making use of professional bodies as agents undertaking teaching quality assurance on behalf of the funding councils raises a number of problems (Harvey and Mason, 1995, p.38).

- Professional bodies may be competent to assess the content of proposed courses, the experience of teaching teams, resources needed, and so on but it is questionable whether they have assessors equipped with the skills to assess teaching and learning.
- It is also unlikely, with the exception of very large and well-endowed professional bodies, that they would have the resources to undertake a regular and detailed assessment process.
- Professional bodies, as was discussed in Chapter 2, may be motivated by self-interest, which might translate into restrictive practices to safeguard the interests of their members or their own power base. In some circumstances, this might lead to conservative approaches to teaching and learning inappropriate to widening access.
- Professional bodies may overemphasise the requirements of the profession in terms of required knowledge and skills at the initial stage and jeopardise the general undergraduate education that an undergraduate degree should encapsulate, irrespective of subject matter. This is particularly important where, for example, an increasing proportion of undergraduates taking professionally-linked first degrees will not end up as professional practitioners.
- Given the increasing delegation of initial education to higher education institutions it might be more appropriate for any professional body involvement in quality assessment to be at the level of professional education.
- Finally, as not all subject areas are covered by professional bodies an alternative process would be required, which may raise substantial issues of equity of treatment.

There is a feeling by some professional bodies that external quality monitoring, especially quality assessment of professional education, simply reproduces what the professional body already does. For example, the Law Society regards the inclusion of the professional qualification, the Legal Practice Course, in external quality monitoring undertaken by the funding councils as a duplication of effort. Furthermore, it regards the funding council assessment as far less rigorous than the approach undertaken by the Society. The HEFCE exercise is something that might take place once every five years, the Society reviews provision of the professional courses on an annual basis. Furthermore, the students pay high fees for the Legal Practice Course and 'we feel it's our

responsibility to monitor that particular course, and retain fairly close links with it to ensure the students receive value for money' (LS, 1995).

In such circumstances, the professional body does not particularly want to act as an agent within a national system, rather it doubts the need for any other external quality assessment of professional education, particularly where the professional or regulatory body has a statutory duty in relation to education.

Synchronisation of procedures

A more likely scenario, and one preferred by some professional bodies and actively encouraged by the Quality Assessment Division of HEFCE is a collaborative process that attempts to synchronise procedures to reduce the burden on institutions.

HEFCE is in the process of discussing collaborative arrangements with several professional and regulatory bodies including the Institution of Chemical Engineers (IChemE), Royal Institute of British Architects (RIBA), Royal Society of Chemistry (RSC), Royal College of Veterinary Surgeons (RCVS), the General Medical Council (GMC), and the Central Council for the Education and Training of Social Work (CCETSW). CCETSW, for example, is concerned that, what it perceives as a the 'more general approach to quality in HEIs' developed by HEQC and the Funding Councils, is linked in with its own quality assurance processes.

> The main thing from our point of view, however organised, is that the requirements are dove-tailed so students and staff in HEIs are supported by the quality assurance systems rather than overwhelmed by them. As an awarding body, we don't mind who does what. (CCETSW, 1995)

HEFCE's work with IChemE is at the most advanced stage and there is a clear intention within the engineering discipline, supported by the Engineering Council and the Institutions, to effect collaborative arrangements where at all possible. Through a joint activity committee (DABCE) the engineering institutions are already synchronising procedures in cases where a higher education institution is being visited by more than one engineering institution in the same year.

> We now have a Degree Accreditation Board for Chartered Engineers (DABCE) which co-ordinates the accreditation visits from all the engineering professions so as to reduce the bureaucracy of visits for HEIs. We have common documentation and have started to have joint visits. (IEE, 1995)

The HEFCE, in discussing collaborative arrangements, is intending to draw on this existing inter-institution collaboration. The intention, to be piloted at the University of Sheffield later in 1995, is for the IChemE accreditation visit and the HEFCE teaching assessment visit to occur at the same time and for both bodies to share common documentation. The one-day accreditation visit will take place in parallel with the 3-day HEFCE visit. The two bodies are concerned with different things and so it has not been possible to agree a joint visit. However, the intention is for the HEFCE team to be slightly larger than normal with one person being involved in the accreditation visit as well. The precise details still need to be resolved and this is likely to be finalised in a pre-visit meeting in November 1995. [18]

HEFCE have circulated a consultation paper proposing a model based on the pilot work. Professional bodies that have responded tend to fall into three camps:

- those who applaud the intention to develop such collaborative arrangements and are keen to reduce the burden on academic staff;
- those who are broadly in favour but think there are irreconcilable differences and who expect the limit of the collaboration to be shared documentation;
- those who regard accreditation and teaching quality assessment as quite distinct and have no interest in collaborative arrangements.

It seems unlikely, in the long term, that PRBs will be able to resist the political pressure to reduce the burden on academic staff, although there is no intention whatsoever for PRBs to be compelled

to collaborate with the funding councils over quality assessment.

The Higher Education Quality Council (HEQC) has undertaken a project to try and identify the overlap between its methods and those of the professional bodies with the most involvement in higher education, with a view to reducing the burden of external monitoring. Most bodies interviewed in the *QHE* research do not see any substantial overlap between their own and HEQC processes, although this would change if there is a significant shift towards the monitoring of academic standards (LS, 1995).

For some professional bodies, there is a feeling of being overlooked in the headlong rush to introduce national external quality monitoring. Referring to the architecture assessment undertaken by HEFCE, which involved some departments of planning, a representative of the Royal Town Planning Institute commented:

> I think it's very disappointing that the visits are going on independently of the work that we're doing. I've made comments, in consultations to HEFCE and HEQC, that we have become one of the many 'irritants' to the schools because we're there alongside so many others. It would be nice if HEFCE or somebody else would accept our efforts as fitting into theirs, either by being able to remove part of theirs or to accept what we're doing and leave Town Planning out. There now seems to be some moves in this direction, or at least, consideration of this. (RTPI, 1995)

The Teacher Training Agency would also like to be clear about the balance in external quality assessment of initial teacher training and to get agreement, clarity and consistency into the purpose, rationale, concepts and gradings used.

> We have been meeting with HEQC, HEFCE, OFSTED to discuss how we are going to work together. We need a code of conduct for the sharing of information. We also need a common code of conduct for things like self-assessments. It would be crazy if all were to demand different self-assessments from the colleges. We need to collaborate on that issue and we may need to collaborate on issues such as, what is quality? What do gradings mean? Do we believe in gradings for everything? We will continue to have regular meetings. (TTA, 1995)

Part of the problem, from the point of view of professional bodies is the instability of the current system of external quality monitoring. The speed of change in higher education, together with diversity of goals and opinions within the system, prevents any coherent picture emerging.

When undertaking accreditation CCETSW tries to ensure that it does not duplicate what the HEFCs and HEQC are demanding of institutions. However, any long term approach is difficult as:

> HEFCE has only just started and the role of HEQC is under debate and is changing. We can't reflect and look back on a stable period. Everybody is committed to trying to make it work but it is difficult. (CCETSW. 1995)

This is echoed by the Law Society, although they are much more concerned about the future shape of external quality monitoring:

> Who knows what is going to happen next time with HEFCE anyway. I think the main problem at the moment is ... that you won't get that sorted out until HEFCE and HEQC have decided what they want to do... Now our assessment and moderation processes are very much geared towards the student experience. And in whatever merger takes place...*I would hope that there are ground-based assessment processes for the quality of experience for students*, because they are the people that matter at the end of the day.... [At the undergraduate level] we see institutions as being responsible for their own monitoring both internally and externally through HEFCE. Whether the Law Society would take a different view if the HEFCE took a back seat and quality assessment was confined to the HEQC methodology, I don't know what the position would be then....I suspect that there would be many people who would be somewhat concerned if the right form of quality assessment wasn't taking place. (LS, 1995)

Rationalising external quality monitoring

There is growing support for combining professional accreditation and quality monitoring of higher education provision. 'In terms of quality there has got to be a move from the three processes of quality council visits, funding councils and accreditation visits because of pressure on the poor

heads of department' (IEE, 1995).

This would require effective partnerships between institutions, professional bodies and funding councils. It would also require more effective forms of communication within institutions. The diversity of professional bodies and their practice is not always appreciated by higher education institutions, the knowledge about particular professional body requirements is often held at department level and institutional knowledge is fragmented.

Commonality of paperwork would be a good place to start, a process that is underway in engineering, co-ordinated by DABCE. Similarly, the HEQC project, reviewing the overlap between audit and professional accreditation procedures, may result in some rationalisation of the demands placed on higher education. However, most professional bodies see their focus in terms of content, delivery and standards of courses rather than institutional quality assurance mechanisms.

Despite the desire to synchronise procedures and develop collaborative mechanisms, it must be remembered that professional accreditation, teaching quality assessment and quality audit have different purposes and so significant convergence is not particularly likely. Indeed, if convergence does occur, other than at the margins, there might be reasonable questions asked about the need for so many different forms of monitoring. The most likely scenario, given the current tri-partite focus on quality in Britain, is some accommodation being drawn up on areas of overlap.

> There's one fundamental problem with the funding council that is that they wanted to get all the courses in one particular profession on to the map as quickly as possible, say, within six months, now we have a rolling programme of five years. So it may well be that the funding council does all the first visits in say electrical engineering over a six month period and then revert to a rolling programme with us doing the visits after that. These are the things that we've got to thrash out. The will is there on both sides. (IEE, 1995)

Despite the evident will to attempt convergence at the margins, reservations remain about full and effective partnership, including:

- a lack of evidence that PRBs wish to increase their role in higher education quality assessment and quality assurance systems. Increased involvement is demanding and time-consuming, not least because implicit traditional notions would need to be translated into explicit and accountable standards;
- professional bodies seeking to protect standards to meet the needs of their own stakeholders—a view accentuated by concerns that professional bodies are more likely to be motivated by self-interest rather than the public interest;
- members of the profession seeking to raise the status of the profession, by insisting on higher levels of initial and professional qualification, or resisting wider access; [19]
- a fear by academics and institutional managers of increased 'interference' by external agencies in internal quality monitoring, standards setting or even teaching and learning;
- some high-status universities choosing to forego accreditation for their high-reputation, high-demand courses if they perceive that the partnership concept is compromising what they consider to be 'quality';
- institutions seeking the most cost-effective method of setting and maintaining standards and resisting the cost implications of partnership:

It is, therefore, important to engender trust between the partners in the combined process and to clarify the purpose of the partnership from the outset.

Effective partnership encourages different perspectives on the issues, such as, curriculum design, methodology and content, which broaden the horizons of the provision and benefit the participants.

The process of working in partnership would be facilitated if higher education institutions, professional bodies and external monitoring agencies clearly and unambiguously specify the purposes of quality monitoring, identify common ground, and clarify terminology and concepts so that everyone is speaking the same language.

Summary points

- There is a strongly supported view within higher education that professional bodies should continue to have a role in quality monitoring in higher education although some professional bodies argue that they need no role beyond accreditation.
- Approval procedures (including accreditation and validation) involve a mixture of correspondence, documentation; professional-body specified on-site visits and attendance at internal validation events.
- Most professional bodies adopt an 'arms-length' approach to initial education. There is a growing tendency for professional bodies to delegate and trust higher education institutions to provide a suitable initial education. In the main, where visits are made they are designed to include dialogue and dissemination.
- Approval of professional education is also varied but PRBs tend to more closely specify validation processes and undertake more frequent reviews of provision.
- A few professional bodies are directly involved in external quality monitoring (undertaken by HEFCs and HEQC) although with little involvement in the criteria upon which assessments are based.
- There is a strong desire, in some quarters, to attempt synchronisation of professional procedures with other forms of external quality monitoring. However, some professional bodies feel that national approaches have overlooked the well-established and rigorous procedures they have in place—with a consequent danger of duplication of effort.
- Professional accreditation, teaching quality assessment and quality audit have different purposes, which minimises the possibility of significant convergence. Most professional bodies see their focus in terms of content, delivery and standards of courses rather than institutional quality assurance mechanisms.
- Some professional bodies would be concerned if future external quality monitoring shifted the emphasis from course assessment to institutional audit of procedures.

Chapter 6
CHANGES IN PROFESSIONAL EDUCATION

The future development of professional education has to address three major issues:

- National Vocational Qualifications;
- lifelong learning;
- the globalisation of the professions.

These issues will not be addressed by professional bodies alone, all three issues are a concern of a wide variety of stakeholders. However, they are particularly pertinent to the future development of professional education, given the changing nature of employment.

National Vocational Qualifications

PRB involvement in the development of NVQs

The development of higher-level NVQs and SVQs has been orchestrated by Government departments and based on collaborative arrangements including higher education, employers and professional bodies. Indeed the Employment Department in its vision statement acknowledges that:

> It can only be achieved through collaboration and through the talents, experience and insight of all those involved in creating, delivering and using them. (ED, 1995, p.11)

The involvement of professional bodies in the development of NVQs at all levels is widespread. The majority of the organisations interviewed were represented on their respective industry lead bodies, quite often providing the secretariat. The main area of development in which professional bodies appear to have been involved is the development of occupational standards. However, some professional bodies, such as the Chartered Institute of Housing, have an integral role in the process:

> We are a joint awarding body with City and Guilds in England, Wales and Northern Ireland, and with SCOTVEC in Scotland. So I think we have had quite a close involvement in the development of NVQs. (CIH, 1995)

Others are concerned that their expertise will be used in the development of NVQs but that they will not find a role in the implementation and the national framework as a whole.

> There has got to be some way in which we are involved in all of this and not just in the development stages, but continuing... We really haven't got the picture yet as to how these things are going to be organised. So it's a very difficult thing to say at the moment, except that we should be. But I'm not quite sure how we will be allowed to be and how we actually will be able to be. (IoB, 1995)

For those who are not yet involved with the NVQ process, it may well be the uncertainty and lack of clarity within the system that is failing to encourage further involvement.

> It seemed to us that it was a system which was still finding its feet and there wasn't an obvious niche for us in it as yet. That's not to say there won't be in the future...[but] there is a difference between our philosophy and that of the NVQs in that we have a very carefully controlled assessment system and we do not, at present, think the NVQ system comes up to our standards. (GAGTL, 1995)

Higher-level NVQs

The professional bodies interviewed in the *QHE* research, expressed no real problems in developing either the occupational standards or the assessment criteria to accompany those standards up to level 3. NVQs are seen to be appropriate for the assessment of technical competence but within most professions this tends to be at a lower level than the professional bodies generally represent, that is, technical support staff.

> We are much more interested at levels 3 and 4 where there aren't existing qualifications for planning enforcement officers, administrators and technical support staff. We have Department of Employment funding for a specific project and it is the RTPI that is leading the work in planning at levels 3 and 4. (RTPI, 1995)

However, it is beyond NVQ level 3 that reservations were disclosed about the implementation and success of higher-level vocational qualifications. There is perceived to be a big conceptual difference between level 3 and levels 4 and 5. It has not been too demanding developing the lower level NVQs, because occupational standards can easily be expressed in competencies at the technical, manual or craft level. However, at the higher level, the professional level, occupational standards are seen to encompass qualities that cannot be expressed in terms of competencies. In the case of the Chartered Society of Designers it is the competence-based assessment process that is not felt to adequately represent the qualities of a designer. NVQs are perceived as inappropriate for 'assessing the intangibles of creativity which is what design is very much about' (CSD, 1995).

Professional ethics, creativity, problem solving and underpinning knowledge and understanding (or UKU) are just some of these additional qualities that NVQs are judged to be incapable of measuring.

> We see the chartered engineer at level 5, and the incorporated engineer at level 4ish. But there's interlinking between the two, and the transition between the high grade technician engineer to a low grade technician engineer—your washing machine repairer—is huge.. UKU is fundamental to it. You can't just teach everybody engineering principles. They are very complex. I come back to mathematics, the analytical skills that are required of a Chartered Engineer are wide and there are only a certain number of people who can master them. (IEE, 1995)

However, some people welcome the distinction between level 3 and level 4. The problems of assessing these 'professional' qualities should not be seen as impossibilities but rather as challenges to assessment methodology within the NVQ framework: a shift perhaps from straightforward competencies to professional outcomes.

> I'm heartened by some things in the Employment Department document, one of which is the statement that vocational qualifications at levels 4 and 5 will be very different animals to those at levels 1 to 3...I do think that to totally rule out the effect of the education process in the end-result is actually a great mistake... I cannot believe there is not something significant about the process that contributes to the outcome as well as those merely measured competencies. (UKCC, 1995)

Demand for NVQs

Not all professional bodies felt certain of the demand for NVQs from employers within their sector, given that there are existing comparable qualifications, either offered by the professional body themselves or through the employers own training programme. For example, the Royal Environmental Health Institute of Scotland developed a skills-based hygiene award, with SCOTVEC, at the most basic level but it failed to recruit because it involved on-the-job assessment, which organisations were not prepared to undertake (REHIS, 1995). Similarly:

> It's no secret that a vast amount of time and money has been spent on poistioning ourselves for no return because the employers are very sceptical about them because of the operating costs. (CIB, 1995)

The cost of the development of NVQs has been largely, if not entirely, funded by the Employment Department in most industries and professions. This has often taken the form of research and

consultation exercises designed to establish the occupational standards and professional competencies. Whilst this research has contributed to the development of NVQs, it has also played a significant part in the development of the CPD programmes of some professional bodies. If it was the intention of the Employment Department to encourage professional bodies to integrate NVQs into their qualifying system then they may be disappointed to learn that many professional bodies are only regarding higher-level NVQs as equivalent to their work-based training requirements.

> We've all set our own standards, each of the professional bodies did their own competency study funded by the Employment Department. The theory was that you could put all those together and have one set of competencies...but the point is you don't need it. It's easy. If you take the Engineering Council they're just recognising NVQ's for their experience requirements. They don't set NVQ's themselves and I don't think that the CCAB group intends to develop those sort of standards. So they're not going to be NVQ as such but we may very well accept NVQ's as an equivalent. (ACCA, 1995)

Impact on professional education

It is perhaps the contribution to the development of learning outcomes as opposed to mere occupational competencies that the concept of NVQs can offer the professional sector at level 5. Certainly at the Third *QHE* 24-Hour Seminar the Minister for Higher Education envisaged a positive relationship between NVQs and professional bodies:

> Professional bodies are looking hard at their roles in education and training. Some, like the engineering bodies, are completely revising their thinking about what they call initial formation. And many are asking—as are employers—about the possible contribution of higher-level National Vocational Qualifications (NVQs) in establishing the learning outcomes, which they want to see as a definition of a competent professional. (Boswell, 1995)

It is easy for comparisons to be drawn between the expressed purpose of professional qualifications and NVQs at level 5. Both are there to assure professional competence, beyond that of technical capability and degree-level knowledge. The view from the professional sector is mixed as to whether the NVQ contribution is either a hindrance or a help in expressing professional outcomes. The Institute of Chartered Secretaries and Administrators sees NVQs as complementary rather than competitive. Other bodies are simply considering how NVQs will fit into their entry requirements. ACCA (1995), for example, see NVQs as fulfilling work-based requirements but cannot envisage them replacing their examinations. Others see no possibility of NVQs replacing professional qualifications:

> We have reservations about NVQ's at level 5, and think the message is still not at all clear and changes constantly, but, yes, we are participating. We see them as potentially being useful for gap filling and CPD, but as a replacement for professional qualifications, there's still lots of questions around that. (RTPI, 1995)

Findings from HEQC research indicate that most professional bodies 'expressed uncertainty over their relationships with NCVQ' and many were concerned about the likely impact of S/NVQs. In some cases, professional bodies were hostile to the whole initiative (Brown, 1994).

In the construction industry, for example, commentators have been extremely cynical:

> Having served on a number of task forces developing NVQs I have concluded that this system of qualification is designed to become a preferred alternative to that offered by the major professions within the industry, rendering existing professional qualifications obsolete and with them the professional institutes which award them. (Smith, 1995)

Smith notes that the Construction Industry Standing Conference (CISC), which is responsible for devising NVQ subjects, has excluded professional categories such as 'architect'. The titles and contents of NVQs are seen to be undermining the professional link. For example, the 'architect's role is being usurped by overlapping NVQs such as those of the building designer and architectural technologist'. Furthermore, 'architecture' is being cut up into a variety of discrete NVQ packages. The result is that 'a quasi-professional structure is being designed to marginalise the profession'. Smith (1995) asserts that civil, structural and service engineers will face a similar threat.

The feared demise of the professions expressed by some commentators has arisen because of the recent focus on NVQ-style competencies within the professional sector. Whilst PRBs may recognise that the evaluation of professional competencies is a useful and worthwhile exercise, this in no way provides a sum of the professional's ability and experience. The competence-referenced assessment methodology that NVQs are based on is clearly not sufficient for assessing the professional.

Professional bodies, in general have switched their focus from input and process to concern for outputs. However, an output-based approach, the ability to act as a professional, is not easily articulated and is difficult to assess in an NVQ format. The professional requires a combination of technical competence, underpinned by knowledge and understanding, utilised in the manner of the reflective practitioner. (The attributes of the 'reflective practitioner' are discussed in Chapter 3.) Indeed, the 'application of the notion of competence to the activities of the skilled professional is misjudged, for it emphasises what the professional does', whereas professional action 'cannot be reduced to mere technique...[it] is an extraordinary amalgam of mind and body, of thought and action, of knowing and doing. Accordingly professional education...should reflect that complexity and interwovenness' (Barnett, 1992, p. 190).

> What's a professional qualification all about? It's about an element of broadening, it's about giving technical knowledge as well. I wouldn't have thought that what we do now is that far from an output-based approach, it's trying to give people knowledge to do their job better and to open minds a little bit. (CIB, 1995)

There is a further criticism of the narrow focus on professional competencies as they are now defined under the NVQ format. The ability to carry out a specified action or to complete a necessary task does not give assurance of the ability to confront and motivate change. The pace of change in the modern economy reflects the need for the skills of anticipation and transformation amongst future professionals. A rigid assessment of competencies may quickly be outdated.

> Today's competencies are not tomorrow's. Competent professionals will be able not simply to cope with change but actively shape change. They will be able to form a view of their own profession and it's changing relationship with society, and society's evolving demands on and expectations of the profession. These are not simply 'competencies' but the abilities to carry on a conversation about competencies, to evaluate them, to embrace new ones and discard old ones; in short, to point the profession in new directions. (Barnett, 1994, p. 73)

Why should competencies be seen to have greater longevity than knowledge? It is widely acknowledged that the half-life of knowledge is rapidly decreasing (Harvey, 1994). There is no evidence to suggest that the competencies and skills that are developed in graduates and young professionals will adequately equip them to deal with demands a decade later.

The recent consultation put out by NCVQ on the future of GNVQs at higher levels, suggests that there is the potential to solve many of these issues within a unified framework.

> Higher level GNVQs, if introduced, will complement higher level NVQs and professional qualifications, and will form a bridge between higher education and employment. (NCVQ, 1995, p.1)

Whether NVQs can be transformed to take account of these issues and in particular the notion of the reflective practitioner is central to the future relationship between the professional qualification and the development of NVQs at level 5.

Lifelong learning

The phrase 'lifelong learning' is a familiar, fashionable and seemingly admirable concept. Within post-compulsory education this can be seen largely as a result of an increasingly destabilised employment sector. The need for people to be engaged in continual learning reflects the current and (anticipated) future demands of an economy that sees change as its driving force and its workers as

disposable providers of appropriate skills and competencies.

Within the professional sector, lifelong learning has been taken up and embraced in the form of continuing professional development.

Definition of continuing professional development

An increasing priority of professional organisations is the provision and promotion of continuing professional development (CPD). This is defined by the Royal Town Planning Institute as:

> The systematic maintenance, improvement and broadening of knowledge and skill and the development of personal qualities necessary for the execution of professional and technical duties throughout the practitioner's working life. (RTPI, 1992)

CPD can be undertaken by an individual on a formal or an informal basis. The provision that the professional body may make in order to support this may be seen in a variety of different ventures.

Extent of CPD

The provision of CPD schemes and policies throughout the professional body sector is both extensive and varied in its implementation. Some professional bodies merely encourage their members to undertake regular 'updating' activities, others require evidence of CPD as a condition of membership.

Compulsory systems of CPD

Several of the organisations interviewed had implemented mandatory systems of CPD. These systems varied in their practice, some being based on a points system, others preferring to stipulate a number of hours per year. The Chartered Institute of Housing requires evidence of CPD as a condition of their fellowship membership. The scheme that it operates requires members to accumulate a number of points over a three-year period. Points can be gained for a variety of activities including courses, personal study and attendance at seminars or meetings. There are three different categories for scoring points and members are required to score points in each category, however, the scheme appears at present to have bureaucratic drawbacks(CIH, 1995).

Since 1992 the Royal Town Planning Institute has operated a mandatory system of CPD. All members are required to complete fifty hours of CPD activity over a two year period. All CPD is self-assessed by the individual members who complete a record of their activities. The Institute then recalls a sample of their members' records for evaluation.

> If they don't submit a satisfactory record the ultimate sanction is for them to lose their membership, but there are interim stages of counselling etc. prior to that. (RTPI, 1995)

Neither the Chartered Institute of Housing nor the Royal Town Planning Institute are regulatory bodies with statutory powers. The enforcement of their CPD policies is solely based on their conditions of membership. They cannot stop their members from practising should they not comply with their CPD arrangements. Other practitioners in professions that are governed by statutory regulations have to complete a programme of CPD for them to be allowed to register and practice.

The United Kingdom Central Council for Nursing, Health Visitors and Midwifery (UKCC) has introduced a compulsory Post-Registration Education and Practice (PREP) scheme that requires all nurses, health visitors and midwives to complete a minimum of five days study over a three year period and keep a record of their learning activities in a personal professional profile. Registration with the UKCC is subject to fulfilling the PREP requirement, and registration with the UKCC is necessary for health workers to practice. The Royal College of Midwives (RCM), whilst not responsible for the enforcement of PREP, backs up the policy of the UKCC through the provision of short refresher courses, additional guidance literature and promoting 'any new government document and any change in the development of care for mothers and their families' (RCM, 1995).

Within the accountancy profession there is a similar stringent requirement of auditors to complete 21 hours of CPD per year. This requirement is written into the *Companies Act* and it is then left for the professional body to enforce as a condition of membership.

> It's the *Companies Act* that makes it a statutory requirement so we are responsible, for seeing that our members do CPD, to the DTI. So it's part of our recognition as an audit body that our members actually do this and we have to report to the DTI that our members are actually doing it. (ACCA, 1995)

It is only the auditors that have this demand put on them, other ACCA members are encouraged but do not have to complete any CPD requirement.

For compulsory systems of CPD to be effective the professional body clearly has to be confident of enforcing the requirements it makes of its members. This is backed up in law in the case of the accountants and as a statutory requirement for health workers. The influence that the Royal Town Planning Institute and the Chartered Institute of Housing exert is backed only by the threat of membership withdrawal. Given that membership is not a requirement to practice in their respective sectors, this must indicate that their members are not unhappy with the compulsory system of CPD that is operated.

Voluntary Systems of CPD

In other professions there is often a formal policy that supports CPD but it may not require activity as a condition of membership. Although there are exceptions, the Chartered Society of Designers (CSD) stipulates that 30 hours per year CPD activity is expected of its members as part of its formalised CPD policy. However:

> We're trying to avoid words like mandatory and voluntary, we're saying it's a condition of membership...We're saying that it's a requirement and expected of members in practice, but in the end we're leaving it to their professional responsibility...We're seeking to use persuasion rather than a big stick to keep people up to the mark in CPD, because we don't have a big stick essentially, and throwing them out if they don't do it doesn't achieve much. It would only achieve an effect if you were in a position to regulate the profession more strongly than we are (CSD, 1995)

Encouragement is a common tool for professional bodies to use when persuading their members that CPD is a good thing. This encouragement can come in the form of the provision of short courses to the issuing of a personal profile document or record card. But some of those bodies, that are currently only 'encouraging' their members, are looking to introduce a compulsory scheme in the future. The IEE has introduced a voluntary CPD scheme this year with 2000 members volunteering to keep a log book and test the scheme. The scheme involves getting 60 points over three years and if then successful a certificate is awarded.

> This trial period is going to last for three years and there's little doubt that the IEE will go into a mandatory scheme at the end of that three years. (IEE, 1995)

The inevitability of mandatory CPD schemes is a fate that other professional bodies feel that they share, the only problem is how to introduce a mandatory scheme without losing members:

> As with a number of the other professional associations who don't have statutory recognition, we have to walk a tightrope between what our members will accept in terms of the demands that are made of them by a professional association which they voluntarily choose to belong to, and what we can impose on them, and that is a balancing act. (LA, 1995)

Rationale behind CPD

The critical imperative for members of professional organisations to undertake CPD activity must be the rationale that lies behind the CPD drive. The strength and clarity of this rationale varies between different organisations. Some professional bodies such as the Royal Institute of Town Planning see CPD as an extension of their role and duty as a professional organisation:

> Under its Royal Charter, the Institute has a duty to ensure that its members are professionally competent. Competence needs to be continually maintained and developed, and the Council believes that the Institute

> has to take positive action in setting standards and in helping members meet their professional obligations. (RTPI, 1992)

For others, the increasing priority of CPD has been underpinned by lengthy research and consultation with members. For the Chartered Society of Designers this research, which looked at the views of not only designers but design employers and design educators, culminated in the publication of the report *Developing Design Excellence*. The report identified the priorities of members and training needs within the profession.

Although professional bodies can identify their educational role within the provision of CPD, the priority placed on CPD by the professional sector presents an opportunity for expanding commercial membership services for those professional organisations that choose to take advantage of it.

> People are going to be required to do 50 hours a year CPD to maintain their status. So if they don't do their 50 hours then they're in danger of not being able to sell their products to the public. There's a role for us there to build programmes which people can either buy into as individuals or employers would build and use elements from it. We're a late entrant, but we are in there now and we're taking it seriously. (CIB, 1995)

Funding of CPD

The funding of CPD is an issue. Professional bodies stipulate their requirements in terms of CPD activity expected of their members and frequently provide short courses and seminars necessary for that professional development, but this kind of provision comes with a price tag attached. It may be expected that employers should pay for their employees individual CPD needs as part of their own staff development policy. However, if employers do not pay, or in the case of freelance/independent professionals where there is no employer to pay, the financial burden falls on to the individual. In the case of the Royal Town Planning Institute they acknowledge that not all employers may be willing to pay and offer advice to their members as to cheap alternatives, such as setting up 'local low-cost or no-cost CPD opportunities, such as lunch time talks from colleagues in other sections or departments, or from other offices' (RTPI, 1992).

Some professional organisations have concerns about the practicalities and take-up of CPD without the provision of allocated funding and stronger support from employers.

> I think CPD will not happen unless the funding basis in the higher education institutions changes. The reality is that it won't attract funding until it becomes a major requirement in employment. At the moment it is based on whether employers see it as a good idea and will support it. (CCETSW, 1995).

The Chartered Institute of Bankers is currently looking at the possibility of producing CPD programmes in partnership with employers, this may be one way of assuring members of support for their CPD activities from employers. Yet, with increasing employment being taken up in the SME sector, these broad intentions between big employers and professional organisations may well be misleading. Becher notes the problems of small professional practices:

> It was clear that those working on their own, or in very small groups, had difficulties in getting away to courses both because of the issue of finding replacements and because of the costs of enrolment (figures of £200 to £300 a day were commonly quoted). The differences between small and large firms have numerous ramifications: in particular, they serve to exacerbate the difficulties of devising effective and widely-applicable policies for continuing professional development. (Becher, 1994a, p. 32)

There is certainly a need for employers to support their employees in undertaking CPD activities whether it be through specific funding or an allocation of time. Professional bodies for their part may consider promoting CPD activities directly to employers, and they should also be flexible in the schemes that they devise to accredit CPD activity taking account of the variation in type and size of employers.

Why is CPD the thing of the moment?

The emergence of formalised CPD programmes has largely occurred over the last five years. Previously, professional bodies provided short courses, seminars and general educational opportunities for their members. These opportunities have recently been drawn together under the banner of CPD, in what can be described as a common drive within the professional body sector.

The rapidly changing nature of employment in the 1990s may provide some justification. The flexibility and the uncertainty of the employment market has affected those in employment as much as those who are unemployed. Professional bodies may be seen as protecting their members' future careers by emphasising the need to continually update and to be constantly employable.

> The trend from 'employment' to 'employability' in business has to a large degree been a central feature of most professionals' career development. (Middlehurst and Kennie, 1994)

The profiling and certificated points systems used in the verification of CPD activities by some professional bodies certainly ensures that their members have a vast quantity of paperwork to show to future employers.

> It's not now about groups of them going around the local brewery or going on a farm visit, it's about turning up for a lecture on problems with letters of credit. But getting something to show for that, not just turning up and sitting through the lecture and going home but using it to build something, a portfolio, a defence. It's a sign of the times. (CIB, 1995)

A more common justification for CPD in the 1990s is accountability. 'Whatever the cause or the causes [of the growth of CPD], the effects are recognisable enough. They are manifested in demands for greater public accountability and a consequent concern with quality assurance.' (Becher, 1994a, p. 1). It no longer seems credible for professionals and their clients to enjoy a simple relationship of trust in their interaction (Henkel, 1994). The professional sector has been subject to increasing pressure and scrutiny by government.

> The attitude of Government over the last ten to fifteen years, in this country, has been reasonably hostile to professions generally. They've seen them as being potentially anti-competitive influences, and they've sought to restrict their scope for regulation and control them through restrictive trade practices legislation and so on. (CSD, 1995)

Others see the pressure coming from the client base itself, in a gradual transformation from a passive recipient to an increasingly informed, questioning 'consumer'. The pressure for CDP is also coming from within the professions, given the growing realisation among professionals that there are no longer 'jobs for life' (CIB, 1995).

So are these well-packaged and well-publicised CPD programmes meeting these demands? In some industries CPD may be seen as successful in staving off external regulation. It has undoubtedly given professional bodies another service to offer their members.

> We are making it a significant pitch in terms of retaining members and we are getting a lot of people who are coming to us saying, 'I thought the Institute had lost its way, and that's why I wasn't an active member, but now I hear about CPD it all makes sense'. (CIB, 1995)

Impact on professional education

Ultimately it is difficult, if not impossible, to evaluate whether the client is getting a better service from professionals because they belong to a professional organisation that has implemented a CPD scheme. There is the potential for 'classroom skulkers' within a professional body who can participate in a CPD scheme yet learn little from it. Monitoring active learning from CPD is problematic. Unless the policing is very rigorous, 'the least satisfactory professionals will almost certainly find ways of avoiding or by-passing the more demanding types of provision.' (Becher, 1994a, p. 36).

Some individuals, particularly young professionals, may see nothing unfamiliar in their professional organisations' promotion of CPD: their education may have been continuous, if not

seamless, and for them education is not merely a way of life, but a part of their life. People need to take responsibility for their own future development and in this context continuing professional development is merely common sense. However, the real value to the individual will not be the certificates that they have collected along the way for their CPD activity, rather it is the process of reflection and the subsequent action plan that provides the key to real professional development.

The interest in lifelong learning can be seen to have invigorated post-qualification professional education. However, as some organisations were keen to point out, CPD is nothing new, it is a name change:

> We run a fairly big CPD programme, which all our members are encouraged to join in — we've been doing that for the last 20 years...It was CPE, but now we've dropped the education bit and replaced it with development, but it is the same thing and they're very well attended. (ACCA, 1995)

The conceptual distance between CPD and CPE is very small. However, CPD is very 'nineties'. It can be packaged and sold to professionals as their one defence against an increasingly insecure professional employment sector. Lifelong learning, or CPD, puts the emphasis on career self-management and the responsibility for job security in the hands of the individual. The provision of CPD schemes gives professional organisations an increased role in professional education and extends their service provision to their members.

For the client dealing with the committed professional, undoubtedly the rise in lifelong learning awareness and activity is a benefit. As with all transactions between the client and the professional, the ability of the client to judge competence and ability is impaired by the knowledge imbalance. The existence of CPD schemes is unlikely to increase the transparency of this relationship.

Internationalisation

The Commission of the European Communities

The impetus in most cases for professional bodies to address the issue of internationalisation has come from the European Union (EU) concept of 'Free Movement', and in particular the Commission of the European Communities (1994) document on *Recognition of Qualifications for Academic and Professional Purposes.* The document states that:

> The concept of free movement is thus at the root of the functioning of the European area for the professions and training, for which recognition of qualifications for academic and professional purposes is the principle mode of action. (CEC, 1994, p. 1)

The concept of freedom of mobility for all Community citizens is not only viewed in terms of the right to residence but also in the right to work. All member states within the EU are urged by the Commission's proposals to uphold this basic right by creating synergy between other member states with regard to academic and professional qualification.

The proposals themselves recommend four paths to synergy:

- information;
- academic and professional networks;
- joint adaptation of courses;
- evaluation of quality.

Information is seen as an essential resource for members states in understanding the provisions made in other states with regard to professional qualification. The Commission proposes that a directory of regulated professional bodies in member states is drawn up. This would enable professional bodies to locate their parallel organisations in other member states. A further initiative that the Commission proposes is for national reports to be written on each professional discipline,

encompassing all professional bodies related to that discipline. The existing National Academic Recognition Information Centres (NARIC) would be expanded to take account of the additional information created by the new directories and the discipline-based national reports.

The aim is to establish discipline-based academic and professional networks across member states, designed to promote and facilitate discussion and possible convergence across the Community. The proposals for these European-wide networks envisage the opportunity for wider debate and future planning.

> As a whole, this would provide a good basis for forecasting development in both the training and professional areas, and thus improve the capacity to anticipate requirements, the need for which was stressed in the White Paper. (CEC, 1994, p. 13)

Similarly the joint adaptation of courses is advocated through the organisation of European umbrella organisations representing the national professional bodies. The Commission notes that; 'seeking to standardise the relevant training and national codes of practice are the two most effective ways of controlling their [PRBs] own future and moving towards becoming a European profession'.

The claim is made that achieving high quality education is one of the Union's fundamental objectives. To achieve high quality the Commission believes that the criteria defining quality must be established jointly within the Union.

> Setting up a standard methodology for quality assessment in the member states will strengthen the mutual confidence. (CEC, 1994, p. 14)

The criteria currently being piloted in the areas of engineering and communications are based on a peer review of a self-assessment report.

The proposals lay out a clear set of objectives and design routes for achieving those objectives. How the theory will be taken up by professional bodies in the United Kingdom remains to be seen in many disciplines. However, some professional bodies are well aware of their European partners and their responsibilities towards the globalisation of the professions

Achieving comparability

Some PRBs see pragmatic difficulties in attempting to divide the professional sector into disciplines. Disciplines can generally be agreed upon but, amongst member states, professions may vary widely. For example, the UKCC highlights the fundamental differences in the British qualifying system for nursing.

> Our system of professional education specialises before registration—so you end up as either an adult nurse, children's nurse, mental health nurse, etc.—that system doesn't match any other programmes in Europe. (UKCC, 1995)

For some organisations such as the Institute of Chartered Secretaries and Administrators the professional title that applies to a large part of the membership—company secretary—does not seem to exist elsewhere (ICSA, 1995).

If free movement between nations is an aim of the EU then clearly, for this to work, job transference between nations needs to be possible and to be simple. Direct matches across borders between professional organisations does not seem feasible and so there needs to be a common threshold element.

> universities are going to be able to develop and authenticate the acquisition of both discipline-specific competence and personal transferable skills among their students, which makes them ready for entering a profession in any part of the Community. (Bell, 1994)

Concepts of competence and transferable skills are very standards-based. They introduce the benefits of institutional comparability without creating the problem of there being a prescriptive subject-specific element within higher education. CCETSW clearly see this as the way forward:

> This is what our competence statements are designed to ensure. There are issues in terms of the European directive and how well social work fits into that. They have a very academic criteria for what is acceptable in order for people to transfer their qualifications. We would say they focus too much on the academic side, whereas we get a balance between the academic and the practice. (CCETSW, 1995)

Professional bodies such as the Library Association have taken a more pragmatic approach to the academic element of their conditions for membership.

> We started to accept overseas qualifications on the same basis as UK qualifications in 1985, and we use NARIC as the yardstick in assessing comparability for that. They still have to do our professional development to gain the chartered status, but, their academic qualifications in librarianship we've accepted since 1985 in advance of the EC directive. (LA, 1995)

Professional networks

There already appears to be quite extensive involvement of UK professional bodies in European umbrella organisations and networks. These organisations tend to be viewed positively and are seen as having the ability to effect change. The Institute of Biology holds membership of the European Community's Biologist Association (ECBA) and has had both positive and productive experiences.

> The place to make changes is in the European organisations like ECBA. ECBA is launching a pan-European title called European Biologist, which has equal currency in any member country. (IoB, 1995)

If such pan-European organisations are successful in drawing together the different professional forms found within the Community then any input they have into the higher education stage of professional training will contribute vastly to professional movements between the cultures of nations. Increased professional input in setting higher education standards could well be of value for the career-motivated student and also important in fulfilling the aspirations of a generation of students influenced by successful undergraduate exchange programmes such as ERASMUS.

Standardisation of the professions

Yet there is a distinct and credible fear that the standardisation of the professions for the benefit of the European Union may deny a broad-based undergraduate education for many students. With the vast increase in student numbers across Europe there is the acknowledgement within professional organisations that not all the students on an undergraduate programme related to a profession will go on to enter that profession. There simply is not the demand. In the area of law, for example, the Law Society predicts that only around forty per cent of law undergraduates will go on to practice within the profession. From its perspective the fear is that the standardisation of a programme geared towards a profession will leave two thirds of the students with limited options.

> The professional bodies specify a minimum content that is required for professional progression, to go beyond this in an attempt to establish a Europe-wide common core would stifle diversity, restrict proper academic autonomy and disregard the needs of the majority of students. (LS, 1995)

These fears do not appear to have been taken account of, indeed even acknowledged, in the proposals from the Commission.

Global employment

Only the Library Association saw the area of languages as a potential problem for UK professionals in terms of global employment. It noted that the vast number of posts within the European Commission itself for librarians were often unobtainable because UK professionals often did not have the necessary language abilities despite their broad-based librarianship qualification being aptly suited to the demands of the Commission.

> One of the things that we have been seeking in our accreditation in recent years, is for courses to provide students with the option to take a foreign language. (LA, 1995)

Beyond the European Union similar moves are being made in other areas of the world to assure global employment using the same concept of freedom of movement. A similar process has been initiated in North and South America. As a result of various regional and global trade agreements the international mobility of the professions is high on the agenda. The North American Free Trade Agreement, (NAFTA), has the United States, Canada and Mexico as its three constituent members and has tenets of non-discriminatory treatment for what it terms as 'service providers' such as the professions. Members can no longer discriminate on the basis of nationality, there has to be a system of international recognition. NAFTA has explicitly called for members:

> to encourage the jurisdictions in their respective territories to develop mutually acceptable standards and criteria for licensing and certifying professional service providers and to provide recommendations on mutual recognition. (Peace-Lenn, 1995, p. .210)

It is not only NAFTA that is calling for these moves but also the General Agreement on Trade and Services of the World Trade Organisation (GATS). In addition the Asia Pacific Economic Cooperation (APEC) approved, in November 1994, a Declaration of Common Resolve for free and open trade by the year 2020. The pressure from these trade organisations may be fundamental to the moves that are made between nations in facilitating and promoting the globalisation of the professions. European nations need to look wider than Europe in the attempt to provide synergy between the professions. Peace-Lenn in her examination of these issues predicts that;

> Those quality assurance systems which have already considered the need to incorporate regional or global standards of quality to improve internal competency and external competition will be in a better position to propel the purposes of these various trade agreements than those who have remained nationalistic and myopic in scope. (Peace-Lenn, 1995, p. 212)

Impact on professional education

The attempt to internationalise higher education and professional education and training provides great opportunities. Employment trends demand greater mobility of workers and not just within one nation. The recognition of academic and professional qualifications is the first step in facilitating this mobility. The measures proposed by the Commission appear to be widely acceptable to the professional bodies that were interviewed and for some bodies the proposals merely reinforce development that has been taking place within their profession over a number of years.

However, not all PRBs see the proposals as unproblematic and necessarily achievable or desirable. The objective of comparability in areas where there is no parallel profession or fundamentally different routes to qualification will certainly require thought, development and discussion on perhaps the basis the suggested networks will provide. Clearly, problems such as these can be solved if dialogue on a Europe-wide basis is possible. The wider move towards transparent, profiled professional competencies may help ease comparability considerations.

However, the fears about the effect of standardisation are real, and the European Commission will have to address the needs of students who do not follow a straightforward professional career path. With the increase of modularised higher education programmes this proportion of the student population seems likely to increase. Mobility is desirable, however. Within higher education and the modern economy, flexibility and access are increasingly necessary. Rather than standardise each member state's system of professional education, particularly at the initial education level, the launch and promotion of pan-European professional titles such as the 'European Biologist' may offer an alternative solution to attempts to directly match different professional qualification requirements in different EU countries.

Summary points

- A pro-active approach by PRBs to the concept of lifelong learning has manifested itself within continuing professional development activities. These have achieved a sharper focus within professional bodies, and are designed to continually inform, update and educate the professional member.
- The strength and clarity of the rationale for CPD varies enormously between different professional bodies.
- Formalised CPD programmes have developed largely over the last five years. The rapidly changing nature of employment in the 1990s may provide part of the rationale, but, a more common justification is accountability, with pressure coming from the client base, in a gradual transformation from a passive recipient to an increasingly informed, questioning consumer.
- The involvement of professional bodies in the development of NVQs at all levels is widespread. Their main contribution is the development of occupational standards.
- It is beyond NVQ level 3 that reservations were disclosed about the implementation and success of higher level vocational qualifications. At the professional level occupational standards are seen to encompass qualities that cannot be expressed in terms of competencies.
- Not all professional bodies are convinced of the demand for NVQs from employers within their sector as there are existing comparable qualifications, either offered by the professional body themselves or through the employer's own training programme.
- Whether NVQs can be transformed to take account of the reflective practitioner is central to the future relationship between the professional qualification and the development of NVQs at level 5.
- The imperative towards the internationalisation of the professions has been provided in recent years by the European Commission's proposals for the recognition of academic and professional qualifications across the Union in order to facilitate the concept of freedom of movement.
- Although freedom of movement may be desirable, comparability across national professional boundaries may be problematic.
- There is a fear that standardisation across the professions, to achieve international comparability, will provide a narrow and limited programme of study, especially at the level of initial education. This will not benefit those students who wish to study a professional course but do not wish to enter the profession.

Chapter 7
CONCLUSION AND RECOMMENDATIONS

Higher education is changing rapidly. Wider access, student-centred approaches, new information technology, lifelong learning and internationalisation have all contributed to a fundamental shift in the nature and purpose of higher education. Higher education faces enormous pressures of accountability and responsiveness. Issues of quality and standards are of central importance and higher education institutions must be prepared for continuous and rigorous scrutiny of the quality and standards of their provision and of their own internal processes of quality assurance.

A significant amount of higher education provision is linked to professional education and development and this is likely to increase. In Britain, professional and regulatory bodies have a duty, sometimes enshrined in statute, to ensure the adequacy of professional training. They also have considerable experience of accrediting and validating higher education provision, particularly at the course level.

Professional and regulatory body approval is one form of external scrutiny, and is complemented by funding council quality assessment of subjects, quality council audit of systems and the long-established system of external examiners. A major issue facing the British higher education system is how these complementary elements can be more effectively combined to minimise the burden of quality monitoring on staff and enable the streamlining of procedures within higher education institutions.

The *QHE* research has demonstrated that there is convergence amongst stakeholders as to the important criteria for assessing quality in higher education (Harvey, Burrows and Green, 1992). However, the purposes of the various forms of external scrutiny of higher education are different.

Professional bodies are, at root, concerned that entrants to the profession have minimum levels of knowledge and competence to allow them to practice. While 'initial' education is important, the main emphasis for most PRBs is professional education and training. Funding council quality assessment of subject areas takes a broader view of the learning experience of students and addresses the quality of the provision rather than the standard of outcomes. Quality audit of institutional procedures has, until recently, focused solely on the mechanisms institutions have in place to assure the quality of their provision. The remit has widened and audit is now charged with addressing issues of comparability of standards across the system. The external examining system has been the traditional way that the standard of courses has been monitored and compared. The close scrutiny of student work by invited external peers has been the means of assuring providers that their output is comparable with others in the same field.

Given these different concerns there is little prospect of significant convergence of procedures as things stand, except in relation to the monitoring of standards. However, there are changes, at the margins, that would enhance the processes in which professional bodies are involved but which also have repercussions on other forms of external monitoring of higher education.

The following recommendations are based on the review of professional body involvement in higher education and the perspective expressed by representatives of various professional and regulatory bodies.

Underlying these recommendations is the need to ensure a balance between the requirement of accountability placed on PRBs and institutions and the ownership of courses and assessment of standards by the academic community.

The overwhelming view of professional bodies was that the principle focus of external quality monitoring should be on the course or programme of study rather than institutional quality assurance procedures.

Recommendations

- Professional bodies should define the specific competencies, including underpinning knowledge, that are required of graduates in order for them to be effective practitioners.
- To facilitate the maintenance of standards, professional bodies should design an *explicit* skills and knowledge template to enable a clear specification of threshold standards of attainment.
- However, the responsibility for setting and monitoring standards should be a joint endeavour between teachers in higher education institutions and key stakeholders, including professional or regulatory bodies and employers.
- Higher education and professional bodies should consider for whom the standards are being set—the practitioner or the academic. For example, accountancy as an academic discipline worthy of study is seen in a very different way in relation to practice.
- Academics may be better suited to setting academic standards, but professional bodies may be better suited to setting competence-based standards, taking account of necessary underpinning knowledge.
- There is a shift away from direct control of standards by professional bodies towards indirect monitoring of standards. This move should be encouraged in the light of partnership arrangements between other external quality monitoring agencies.
- The tendency for professional bodies to use the external examiner system—to which they contribute by recommending suitable examiners—to monitor standards of initial and professional education should be encouraged.
- The promotion of continuous learning by professional bodies, in the form of CPD, is to be applauded. However, organisations should consider the effectiveness of mandatory schemes in facilitating the development of professional responsibility. They may also want to consider a more systematic way of accrediting CPD.
- Professional bodies should consider the potential cost of CPD to their members. The encouragement and monitoring of employers with regard to the provision of dedicated resources for CPD should be a priority of professional organisations.
- If NVQs are to be developed in partnership with professional bodies at higher levels, then the competence-based assessment criteria of NVQs need to take account of the reflective practitioner.
- In developing procedures to allow mobility through international comparability, professional bodies should guard against standardisation that results in a narrow and limited programme of study, especially at the level of initial education. The interests of those students who wish to study a professional course but do not wish to enter the profession should be considered.

These recommendations have a wider relevance in terms of the ongoing discussion about the nature and control of quality monitoring in higher education in Britain. The pilot collaborative projects between HEFCE and professional bodies have potential for reducing the burden of external quality monitoring on staff, mainly through shared documentation and parallel visits.

However, going beyond these recommendations to suggesting greater convergence in processes for external scrutiny is difficult given the current perspectives of the funding councils, the Higher Education Quality Council, the professional and regulatory bodies and the traditional role of the external examining system. It would take a fairly major change in the philosophy of external scrutiny of higher education for any significant streamlining and convergence of procedures to occur.

In essence, any rationalisation would require a shift from direct scrutiny by external national agencies of internal procedures and provision to delegation of responsibility to institutions to assure and assess quality subject to external checks. Such checks would assess veracity of institutional reports on the effectiveness of the operation of their internal processes and the adequacy of educational outputs. In short, if the external quality monitoring operated more like financial audit—checking that institutional accounts of quality and standards 'add up'—then there would be more scope for a convergence of external procedures and a streamlining of internal processes of quality assessment and assurance.

For example, institutions could have internal monitoring units in place that :

- oversee the validation and review of courses;
- assess the quality of provision of courses;
- monitor standards of outputs from courses;
- audit aspects of internal procedures, such as the operation of the external examining system, the effectiveness of course director annual reports, the tutorial and guidance procedures on modular schemes, the procedures for assessing students who work in teams, and so on;
- monitor student and employer views of the educational provision and outcomes.

External examiners and, where appropriate, professional bodies would have a major input into these procedures and it would be the responsibility of the institutions to involve them, as they do now. The institution would be required to report, in a standardised form on a periodic basis, to a single external quality agency. The agency would have the opportunity to audit the report and assess its accuracy through targeted on-site visits. Accountability would thus be assured but the quality monitoring would be linked more effectively and efficiently to the institution's own internal quality procedures.

A major advantage of such an approach would be to forefront internal *continuous quality improvement*, as the institution quality report could be designed to identify a strategy for continuous quality improvement and local-level (unit or course) agendas for action. These continuous quality improvement agendas could be internally monitored and externally validated.

Thus, a revised, streamlined procedure would need to incorporate the following features:

- the number of external bodies responsible for quality and standards should be reduced and their separate responsibilities clarified—professional bodies and external examiners should continue to work closely with the internal processes and the single new external agency act as a check on veracity of institutional claims about quality, standards and improvement;
- external quality monitoring should intermesh with internal, ongoing quality monitoring;
- external quality monitoring should have, as its primary focus, improvement in the core business of higher education—the teaching and learning of students;
- external quality monitoring should safeguard standards as well as encouraging quality enhancement;
- higher education institutions, through course teams, should have the primary responsibility for quality of courses;

- internally, course teams should set their own agenda for improvement and be subject to periodic audit of their quality improvement and review of the standards of their courses—where appropriate professional bodies might augment internal audit teams or recommend suitable external examiners;
- where appropriate, the external monitoring agency should use professional body expertise in the audit of institutional claims.

A suggested model is outlined in Appendix 3. Whatever the approach developed, it is important that external quality monitoring of all kinds has as its principal focus the total student experience of learning and the maintenance and improvement of academic standards and standards of competence.

ENDNOTES

1 All the professional bodies offering a qualification also offered designatory letters to indicate qualified professional status with the exception of the Mathematical Association who provide Diplomas and Certificates for practising teachers but which do not result in designatory letters. The Law Societies are included as providing designatory letters, viz. 'solicitor'.

2 The Higher Education Funding Council for Wales (HEFCW) are undertaking no collaborative arrangements in relation to quality assessment.

3 The Department for Education keep a register of students who pass courses, likewise the Qualified Teacher Status is the DFE's qualification.

4 This ethos dates back to the beginning of the century 'It is for the professional association to say what qualifications it wants; to conduct the examination which it exacts as a test of efficiency; and to give the necessary certificates. But education should be conducted by educational bodies, side by side with other students, and in close conjunction with other branches of study' (Sidney Webb, *The Library Association Record*, May 1902).

5 The nature, purpose and effectiveness of continuing professional development is discussed in detail in Chapter 6.

6 The altruism of the professional and the control of the professional body is an argument heavily dependent on a rationalist model (Weber), which postmodernist critics would argue has no currency in the fragmentary post-industrial world of the late twentieth century (Best and Kellner, 1991).

7 See Chapter 5 for details of accreditation and validation

8 25 of the bodies offering their own professional qualification required attendance at an appropriate higher education course. 18 others recognise higher education courses although they are not compulsory.

9 This reflects the notion of transformative quality discussed in Chapter 5.

10 The setting of standards must not be confused with validation of courses or quality assessment. Standards are currently set with the involvement of different groups, many of whom are the relevant professional bodies, and tend not to be cross-institutional.

11 There was a strong feeling amongst delegates at the Third *QHE* Seminar that it was essential that academics worked with professional and regulatory bodies to clearly define standards before the Government imposes some ill-conceived external standards. It was agreed that specification of standards may, in many cases, be merely a problem of articulation of existing practices.

12 There is an issue as to whether it is meaningful to talk about comparable threshold standards in areas that are not linked to vocational or professional practice, such as philsophy, history and the humanities.

13 No clear indication emerged from delegates at the Third *QHE* Seminar as to whether an award should be comparable between institutions or based on the fulfilment of the programmes' aims and objectives.

14 The obligation is vested in two statutory instruments: No. 495 The National Health Service (Speech Therapists) Regulations 1974, as amended by No. 47, 1985.

15 We had information on this item for 66 of the 74 bodies, no information was available for 8 bodies in our sample. The three that indicated they do not formally accredit are: Chartered Institute of Transport, Chartered Institute of Marketing, Institute of Personnel Management.

16 At the time of the interviews with professional bodies HEFCE had undertaken assessments in the following subjects: Chemistry, History, Law, Mechanical Engineering, Architecture, Applied Social Work, Business and Management Studies, Computer Studies, English, Music, Social Policy and Administration, Anthropology, Geography, Geology, Environmental Studies and Oceanography. HEFCW covered the same subjects but since 1994 have also covered the Built Environment, Drama, American Studies, Celtic Studies and General Humanities Studies. SHEFC have undertaken the following assessments: Economics, Electrical and Electronic Engineering, Civil Engineering, Mechanical Engineering (including Production), Mathematics and Statistics, Computing, Geography, Geology,

Environmental Studies, Chemistry, Physics, Business Management, Music, Teacher Education, Building Surveying, Architecture, Fine Art, Graphic and Textile Design, Consumer Studies and Hospitality.

17 To date the HEFCE has not undertaken an assessment of biology and so the comments from the Institute of Biology might be precipitous.

18 We are indebted to Peter Milton of HEFCE for the detail of the latest developments in these collaborative arrangements.

19 Increased professional body involvement may lead to restrictions on the widening of access to higher education. Current widening of access to higher education will potentially lead to more people being professionally qualified, a very real threat to professional job security. Professional bodies have already expressed concern that widening access has two consequences that are against the public interest. First, that underqualified students are entering the profession, which is impacting on standards.
Second, that more graduates are being produced in some professions than can ever hope to find employment. The implication is that there would not be enough demand for their services. In practice, given the way the profession is structured and organised—with a range of restrictive practices—large numbers of new recruits can not be accommodated irrespective of the public demand for their services.
Sceptics suggest that the concern of the professions about increased access is because it is against their own self-interest, the more people entering the profession, the harder it is to maintain a privileged position, status and consequent high income.
Thus, if the professions have more influence on curriculum design, quality monitoring and standards setting then they may attempt to reassert control over access in order to protect their self-interest while pretending that it is concern for the public interest.

20 Employers already have a powerful role in standards-setting through their professional bodies, where those are relevant. However, employers *per se* may not be able to contribute very meaningfully. For example, at a time when the majority of chemistry graduates at one institution go into accountancy, it does not make sense to have accounting firms involved in setting the standards of chemistry degrees.

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APPENDICES

Appendix 1

Methodology

The *QHE* research adopted a multi-method approach to data collection, including in-depth interviews, a questionnaire survey, examination of PRB documentation and an extensive literature search and review.

Various sources were used to identify the professional and regulatory bodies that had some involvement with higher education. One hundred and ten organisations were identified as relevant to the focus of the study.

A short questionnaire that identified the type of involvement, was sent to each organisation (see Appendix 1). Following reminders, 92 organisations responded (a response rate of 84%).

The final sample of respondents to the questionnaire consisted of:

15 regulatory bodies;
74 professional bodies (6 required no work experience);
3 professional associations;
1 voluntary organisation.

Of the 15 regulatory bodies (RBs) 4 were non-statutory regulatory bodies (NSRBs) and 2 others maintained no register.

Not all professional bodies had regulatory powers or chartered status. Indeed, of the 74 professional bodies only 10 had both statutory powers and offered chartered status:

Professional body + offers chartered status + regulatory powers	10
Professional body + offers chartered status but no regulatory powers	21
Professional body + regulatory powers but does not offer chartered status	3
Professional body but no regulatory powers nor offers chartered status	40

On the basis of the responses to the questionnaire a classificatory matrix was constructed and 16 bodies were approached and agreed to be involved in a more detailed qualitative study. They were selected to cover the range of different links to higher education and approaches to validation and accreditation and covered the range of different types of involvement with higher education (see Appendix 2, Table 1).

A senior person in each organisation was interviewed in-depth. Interviews were normally of between one and two hours duration.

In addition to the interviews with the 16 organisations the researchers received lengthy communication from officers of the General Medical Council and the General Dentistry Council as well as correspondence from other organisations, noted in the references.

In addition, *QHE* arranged a 24-Hour Seminar on professional body involvement in higher education, attended by about 100 people, mainly from higher education institutions who were involved with various professional and regulatory bodies. The full proceedings are published separately (Harvey and Mason, 1995).

The outcomes of the interviews, supported by PRB documentation, views expressed at the 24-Hour Seminar and the literature review, provide the main data in this report. Statistical data, unless otherwise cited, refers to the outcomes of the questionnaire survey.

Appendix 2

Table 1: PRB Involvement in higher education

ID	*Name*	*Accredit courses*	*Accredit HEIs*	*Validate courses*	*Validate HEIs*	*Direct input into curricula*	*Influence curricula*	*Professional qualification*	*Body type*
1	Association of Cost and Executive Accountants	Yes	Yes	Yes	Yes	Yes	Yes	Yes	PB
40	Institute of Legal Executives	Yes	Yes	Yes	Yes	Yes	Yes	Yes	PB
64	Society and College of Radiographers	Yes	Yes	Yes	Yes	Yes	Yes	Yes	PB
77	Council for Professions Supplementary to Medicine	Yes	Yes	Yes	Yes	Yes	Yes		RB
80	General Medical Council	Yes	Yes	Yes	Yes	Yes	Yes		RB
56	Mathematical Association	Yes	Yes	Yes	Yes	No	Yes	Yes	PB
81	National Board for Nursing, Midwifery & HV for Scotland	Yes	Yes	Yes	Yes	No	Yes	Yes	RB
85	Welsh National Board for Nursing Midwifery & HV	Yes	Yes	Yes	Yes	No	Yes	Yes	RB
12	Chartered Institute of Marketing	Yes	Yes	No	No	No	Yes	Yes	PB
71	The Law Society of Northern Ireland	Yes	Yes	No	No	No	Yes	Yes	PB
74	The Royal Institution of Chartered Surveyors	Yes	Yes	No	No	No	Yes	Yes	PB
86	General Council and Register of Osteopaths Ltd	Yes	Yes	No	No	No	Yes	Yes	NSRB
35	Institute of Financial Accountants	Yes	Yes	No	No	No	No	Yes	PB
82	Teacher Training Agency	Yes	Yes	No	No	No	No	No	RB[1]
4	British Dietetic Association	Yes	Yes	Yes*				No	PB[2]
7	Chartered Association of Certified Accountants	Yes	No	Yes	Yes	Yes	Yes	Yes	PB
16	Chartered Society of Physiotherapy	Yes	No	Yes	Yes	Yes	Yes	Yes	PB
18	College of Preceptors	Yes	No	Yes	Yes	Yes	Yes	Yes	PB
19	College of Radiographers	Yes	No	Yes	Yes	Yes	Yes	Yes	PB
21	Community and Youth Work Association	Yes	No	Yes	Yes	Yes	Yes	Yes	PB
42	Institute of Management	Yes	No	Yes	Yes	Yes	Yes	Yes	PB
53	Institution of Occupational Safety and Health	Yes	No	Yes	Yes	Yes	Yes	Yes	PB
62	Royal Society of Chemistry	Yes	No	Yes	Yes	Yes	Yes	Yes	PB
78	English National Board for Nursing Midwifery and HV	Yes	No	Yes	Yes	Yes	Yes	Yes	RB
65	Society of Chiropodists and Podiatrists	Yes	No	Yes	Yes	No	Yes	Yes	PB[1]
67	The Chartered Insurance Institute	Yes	No	Yes	Yes	No	Yes	Yes	PB[1]
6	British Psychological Society	Yes	No	Yes	No	Yes	Yes	Yes	PB
8	Chartered Institute of Bankers in Scotland	Yes	No	Yes	No	Yes	Yes	Yes	PB
10	Chartered Institute of Housing	Yes	No	Yes	No	Yes	Yes	Yes	PB
13	Chartered Institute of Purchasing and Supply	Yes	No	Yes	No	Yes	Yes	Yes	PB
14	Chartered Institute of Transport	Yes	No	Yes	No	Yes	Yes	Yes	PB
31	Institute of Chartered Secretaries and Administrators	Yes	No	Yes	No	Yes	Yes	Yes	PB
39	Institute of Internal Auditors	Yes	No	Yes	No	Yes	Yes	Yes	PB
43	Institute of Personnel Management	Yes	No	Yes	No	Yes	Yes	Yes	PB
46	Institute of Taxation Incorporated by Royal Charter	Yes	No	Yes	No	Yes	Yes	Yes	PB
55	Law Society	Yes	No	Yes	No	Yes	Yes	Yes	PB
66	The Chartered Institute of Bankers	Yes	No	Yes	No	Yes	Yes	Yes	PB
73	The Library Association	Yes	No	Yes	No	Yes	Yes	Yes	PB
76	Central Council for Education and Training in Social Work	Yes	No	Yes	No	Yes	Yes	Yes	RB[1]
59	Royal College of Nursing of the United Kingdom	Yes	No	Yes	No	Yes	Yes	No	PB[2]
87	General Council and Register of Naturopaths	Yes	No	Yes	No	Yes	Yes	No	NSRB
89	British Acupuncture Accreditation Board	Yes	No	Yes	No	Yes	Yes	No	NSRB
22	Confederation of Tourism, Hotel & Catering Management	Yes	No	Yes	No	No	Yes	Yes	PB
24	Hotel Catering and Institutional Management Association	Yes	No	Yes	No	No	Yes	Yes	PB
26	Institute of Biology	Yes	No	Yes	No	No	Yes	Yes	PB
27	Institute of Biomedical Science	Yes	No	Yes	No	No	Yes	Yes	PB
63	Royal Town Planning Institute	Yes	No	Yes	No	No	Yes	Yes	PB

Table 1: PRB Involvement in higher education (continued)

ID	*Name*	*Accredit courses*	*Accredit HEIs*	*Validate courses*	*Validate HEIs*	*Direct input into curricula*	*Influence curricula*	*Professional qualification*	*Body type*
75	Architects Registration Council of the United Kingdom	Yes	No	Yes	No	No	Yes	Yes	RB
20	College of Speech and Language Therapists	Yes	No	Yes	No	No	Yes	No	PB[2]
88	National Council for Drama Training	Yes	No	Yes	No	No	Yes	No	NSRB
92	National Council for the Training of Broadcast Journalists	Yes	No	Yes	No	No	Yes	No	VO
41	Institute of Linguists	Yes	No	Yes	No	No	No	Yes	PB
15	Chartered Society of Designers	Yes	No	No	No	Yes	Yes	Yes	PB
25	Institute of Animal Technology	Yes	No	No	No	Yes	Yes	Yes	PB
30	Institute of Chartered Accountants of Scotland	Yes	No	No	No	Yes	Yes	Yes	PB
49	Institution of Chemical Engineers	Yes	No	No	No	Yes	Yes	Yes	PB
50	Institution of Civil Engineers	Yes	No	No	No	Yes	Yes	Yes	PB
51	Institution of Electrical Engineers	Yes	No	No	No	Yes	Yes	Yes	PB
3	British Computer Society	Yes	No	No	No	No	Yes	Yes	PB
9	Chartered Institute of Building	Yes	No	No	No	No	Yes	Yes	PB
33	Institute of Electronics & Electrical Incorporated Engineers	Yes	No	No	No	No	Yes	Yes	PB
34	Institute of Field Archeologists	Yes	No	No	No	No	Yes	Yes	PB
38	Institute of Information Scientists	Yes	No	No	No	No	Yes	Yes	PB
47	Institution for Measurement and Control	Yes	No	No	No	No	Yes	Yes	PB
48	Institution of Chartered Accountants in England and Wales	Yes	No	No	No	No	Yes	Yes	PB
52	Institution of Mechanical Engineers	Yes	No	No	No	No	Yes	Yes	PB
54	Landscape Institute	Yes	No	No	No	No	Yes	Yes	PB
61	Royal Pharmaceutical Society of Great Britain	Yes	No	No	No	No	Yes	Yes	PB
70	The Institute of Physics	Yes	No	No	No	No	Yes	Yes	PB
90	Royal Society for the Promotion of Health	Yes	No	No	No	No	Yes	No	PA
91	Royal Economic Society	Yes	No	No	No	No	Yes	No	PA
11	Chartered Institute of Management Accountants	Yes	No	No	No	No	No	Yes	PB
44	Institute of Public Service Administrators	Yes	No	No	No	No	No	Yes	PB
45	Institute of Quality Assurance	Yes	No	No	No	No	No	Yes	PB
28	Institute of Business Administration	No	No	Yes	Yes	Yes	Yes	Yes	PB
58	Royal College of Midwives	No	No	Yes	Yes	Yes	Yes	No	PB[2]
83	The National Board for Nursing, Midwifery & HV for NI	No	No	Yes	Yes	No	Yes		RB
17	College of Occupational Therapists	No	No	Yes	No	Yes	Yes	No	PB[2]
79	General Dental Council	No	No	Yes	No	Yes	Yes	No	RB
60	Royal Institute of Public Health and Hygiene	No	No	Yes	No	No	Yes	Yes	PB
84	UK Central Council for Nursing Midwifery and HV	No	No	No	No	Yes	Yes	Yes	RB
5	British Orthoptic Society	No	No	No	No	Yes	Yes	No	PB[2]
29	Institute of Chartered Accountants in Ireland	No	No	No	No	No	Yes	Yes	PB
36	Institute of Food Science and Technology	No	No	No	No	No	Yes	Yes	PB
37	Institute of Horticulture	No	No	No	No	No	Yes	Yes	PB
68	The Geological Society	No	No	No	No	No	Yes	Yes	PB
72	The Law Society of Scotland	No	No	No	No	No	Yes	No	PB[2]
2	British College of Optometrists	No	No	No	No	No	No	Yes	PB
23	Gemmological Association & Gem Testing Lab of GB	No	No	No	No	No	No	Yes	PB[1]
32	Institute of Chiropodists	No	No	No	No	No	No	Yes	PB
57	National Association of Goldsmiths of GB and Ireland	No	No	No	No	No	No	Yes	PB[1]
69	The Institute of Export	No	No	Yes*	Yes	No	Yes	Yes	PB[1]

PB professional body PB[1]=PB no work experience PB[2]=PB no professional qualification RB regulatory body RB[1]=RB no register Yes* In special cases

The 16 bodies interviewed in depth were numbers 7, 10, 15, 20, 23, 26, 31, 51, 55, 58 60, 63, 66, 73, 82, 84.

Table 2: Professional body—defining characteristics

ID	Name	Statutory powers	Offers chartered status	Exams	Work experience	Professional qualification
7	Chartered Association of Certified Accountants	Yes	Yes	Compulsory	Compulsory	Yes
29	Institute of Chartered Accountants in Ireland	Yes	Yes	Compulsory	Compulsory	Yes
48	Institution of Chartered Accountants in England and Wales	Yes	Yes	Compulsory	Compulsory	Yes
61	Royal Pharmaceutical Society of Great Britain	Yes	Yes	Compulsory	Compulsory	Yes
70	The Institute of Physics	Yes	Yes	Compulsory	Compulsory	Yes
11	Chartered Institute of Management Accountants	Yes	Yes	Compulsory	Recognised	Yes
68	The Geological Society	Yes	Yes	Unnecessary	Compulsory	Yes
55	Law Society	Yes	Yes	Unnecessary	NA	Yes
50	Institution of Civil Engineers	Yes	Yes		Compulsory	Yes
62	Royal Society of Chemistry	Yes	Yes			Yes
71	The Law Society of Northern Ireland	Yes	No	Compulsory	Compulsory	Yes
72	The Law Society of Scotland	Yes	No	Recognised		No
20	College of Speech and Language Therapists	Yes	No	Unnecessary	Compulsory	No
1	Association of Cost and Executive Accountants	Yes				Yes
6	British Psychological Society	No	Yes	Compulsory	Compulsory	Yes
30	Institute of Chartered Accountants of Scotland	No	Yes	Compulsory	Compulsory	Yes
31	Institute of Chartered Secretaries and Administrators	No	Yes	Compulsory	Compulsory	Yes
46	Institute of Taxation Incorporated by Royal Charter	No	Yes	Compulsory	Compulsory	Yes
74	The Royal Institution of Chartered Surveyors	No	Yes	Compulsory	Compulsory	Yes
67	The Chartered Insurance Institute	No	Yes	Compulsory	Unnecessary	Yes
3	British Computer Society	No	Yes	Recognised	Compulsory	Yes
9	Chartered Institute of Building	No	Yes	Recognised	Compulsory	Yes
10	Chartered Institute of Housing	No	Yes	Recognised	Compulsory	Yes
14	Chartered Institute of Transport	No	Yes	Recognised	Compulsory	Yes
26	Institute of Biology	No	Yes	Recognised	Compulsory	Yes
49	Institution of Chemical Engineers	No	Yes	Recognised	Compulsory	Yes
12	Chartered Institute of Marketing	No	Yes	Recognised	Recognised	Yes
18	College of Preceptors	No	Yes	Recognised		Yes
15	Chartered Society of Designers	No	Yes	Unnecessary	Compulsory	Yes
16	Chartered Society of Physiotherapy	No	Yes	Unnecessary	Compulsory	Yes
47	Institution for Measurement and Control	No	Yes	Unnecessary	Recognised	Yes
51	Institution of Electrical Engineers	No	Yes	NA	Compulsory	Yes
52	Institution of Mechanical Engineers	No	Yes		Compulsory	Yes
63	Royal Town Planning Institute	No	Yes		Compulsory	Yes
73	The Library Association	No	Yes		Compulsory	Yes
2	British College of Optometrists	No	No	Compulsory	Compulsory	Yes
8	Chartered Institute of Bankers in Scotland	No	No	Compulsory	Compulsory	Yes

Table 2: Professional body—defining characteristics (continued)

ID	Name	Statutory powers	Offers chartered status	Exams	Work experience	Professional qualification
19	College of Radiographers	No	No	Compulsory	Compulsory	Yes
24	Hotel Catering and Institutional Management Association	No	No	Compulsory	Compulsory	Yes
32	Institute of Chiropodists	No	No	Compulsory	Compulsory	Yes
39	Institute of Internal Auditors	No	No	Compulsory	Compulsory	Yes
54	Landscape Institute	No	No	Compulsory	Compulsory	Yes
60	Royal Institute of Public Health and Hygiene	No	No	Compulsory	Compulsory	Yes
66	The Chartered Institute of Bankers	No	No	Compulsory	Compulsory	Yes
13	Chartered Institute of Purchasing and Supply	No	No	Compulsory	Recognised	Yes
25	Institute of Animal Technology	No	No	Compulsory	Recognised	Yes
40	Institute of Legal Executives	No	No	Compulsory	Recognised	Yes
23	Gemmological Association & Gem Testing Lab of GB	No	No	Compulsory	Unnecessary	Yes
57	National Association of Goldsmiths of GB and Ireland	No	No	Compulsory	Unnecessary	Yes
69	The Institute of Export	No	No	Compulsory	Unnecessary	Yes
64	Society and College of Radiographers	No	No	Compulsory		Yes
4	British Dietetic Association	No	No	Recognised	Compulsory	No
35	Institute of Financial Accountants	No	No	Recognised	Recognised	Yes
41	Institute of Linguists	No	No	Recognised	Recognised	Yes
43	Institute of Personnel Management	No	No	Recognised	Recognised	Yes
21	Community and Youth Work Association	No	No	Recognised	Recognised	Yes
22	Confederation of Tourism, Hotel & Catering Management	No	No	Recognised	Unnecessary	Yes
65	Society of Chiropodists and Podiatrists	No	No	Recognised	Unnecessary	Yes
27	Institute of Biomedical Science	No	No	Unnecessary	Compulsory	Yes
33	Institute of Electronics & Electrical Incorporated Engineers	No	No	Unnecessary	Compulsory	Yes
34	Institute of Field Archeologists	No	No	Unnecessary	Compulsory	Yes
36	Institute of Food Science and Technology	No	No	Unnecessary	Recognised	Yes
42	Institute of Management	No	No	Unnecessary	Recognised	Yes
53	Institution of Occupational Safety and Health	No	No	Unnecessary	Recognised	Yes
56	Mathematical Association	No	No	NA	Compulsory	Yes
5	British Orthoptic Society	No	No	NA	NA	No
17	College of Occupational Therapists	No	No	NA	NA	No
58	Royal College of Midwives	No	No	NA	NA	No
59	Royal College of Nursing of the United Kingdom	No	No	NA	NA	No
28	Institute of Business Administration	No	No		Compulsory	Yes
44	Institute of Public Service Administrators	No	No		Compulsory	Yes
38	Institute of Information Scientists	No	No		Recognised	Yes
37	Institute of Horticulture	No	No		Recognised	Yes
45	Institute of Quality Assurance	No	No			Yes

Table 3: Registers

ID	*Name*	*Body type*	*Reg of Members*	*Reg necessary to practice*	*Students on accredited courses*	*Reg of those with professional qual*	*De-registration*
7	Chartered Association of Certified Accountants	PB	Yes	Yes	Yes	Yes	Yes
16	Chartered Society of Physiotherapy	PB	Yes	Yes	Yes	Yes	Yes
40	Institute of Legal Executives	PB	Yes	Yes	Yes	Yes	Yes
55	Law Society	PB	Yes	Yes	Yes	Yes	Yes
61	Royal Pharmaceutical Society of Great Britain	PB	Yes	Yes	Yes	Yes	Yes
70	The Institute of Physics	PB	Yes	Yes	Yes	Yes	Yes
74	The Royal Institution of Chartered Surveyors	PB	Yes	Yes	Yes	Yes	Yes
39	Institute of Internal Auditors	PB	Yes	Yes	Yes	Yes	
30	Institute of Chartered Accountants of Scotland	PB	Yes	Yes	No	Yes	Yes
50	Institution of Civil Engineers	PB	Yes	Yes	No	Yes	Yes
71	The Law Society of Northern Ireland	PB	Yes	Yes	No	Yes	Yes
72	The Law Society of Scotland	PB[2]	Yes	Yes	No	NA	Yes
29	Institute of Chartered Accountants in Ireland	PB	Yes	Yes	NA	Yes	Yes
2	British College of Optometrists	PB	Yes	No	Yes	Yes	Yes
3	British Computer Society	PB	Yes	No	Yes	Yes	Yes
10	Chartered Institute of Housing	PB	Yes	No	Yes	Yes	Yes
19	College of Radiographers	PB	Yes	No	Yes	Yes	Yes
21	Community and Youth Work Association	PB	Yes	No	Yes	Yes	Yes
22	Confederation of Tourism, Hotel and Catering Management	PB	Yes	No	Yes	Yes	Yes
27	Institute of Biomedical Science	PB	Yes	No	Yes	Yes	Yes
31	Institute of Chartered Secretaries and Administrators	PB	Yes	No	Yes	Yes	Yes
32	Institute of Chiropodists	PB	Yes	No	Yes	Yes	Yes
35	Institute of Financial Accountants	PB	Yes	No	Yes	Yes	Yes
42	Institute of Management	PB	Yes	No	Yes	Yes	Yes
44	Institute of Public Service Administrators	PB	Yes	No	Yes	Yes	Yes
48	Institution of Chartered Accountants in England and Wales	PB	Yes	No	Yes	Yes	Yes
49	Institution of Chemical Engineers	PB	Yes	No	Yes	Yes	Yes
54	Landscape Institute	PB	Yes	No	Yes	Yes	Yes
63	Royal Town Planning Institute	PB	Yes	No	Yes	Yes	Yes
66	The Chartered Institute of Bankers	PB	Yes	No	Yes	Yes	Yes
60	Royal Institute of Public Health and Hygiene	PB	Yes	No	Yes	Yes	No
69	The Institute of Export	PB[1]	Yes	No	Yes	Yes	No
12	Chartered Institute of Marketing	PB	Yes	No	Yes	Yes	
43	Institute of Personnel Management	PB	Yes	No	Yes	Yes	
46	Institute of Taxation Incorporated by Royal Charter	PB	Yes	No	Yes	Yes	
64	Society and College of Radiographers	PB	Yes	No	Yes	Yes	
4	British Dietetic Association	PB[2]	Yes	No	Yes	NA	Yes
17	College of Occupational Therapists	PB[2]	Yes	No	Yes	NA	Yes
20	College of Speech and Language Therapists	PB[2]	Yes	No	Yes	NA	Yes
59	Royal College of Nursing of the United Kingdom	PB[2]	Yes	No	Yes	NA	Yes
90	Royal Society for the Promotion of Health	PA	Yes	No	Yes	NA	No
6	British Psychological Society	PB	Yes	No	No	Yes	Yes
8	Chartered Institute of Bankers in Scotland	PB	Yes	No	No	Yes	Yes
9	Chartered Institute of Building	PB	Yes	No	No	Yes	Yes
13	Chartered Institute of Purchasing and Supply	PB	Yes	No	No	Yes	Yes
15	Chartered Society of Designers	PB	Yes	No	No	Yes	Yes
24	Hotel Catering and Institutional Management Association	PB	Yes	No	No	Yes	Yes
28	Institute of Business Administration	PB	Yes	No	No	Yes	Yes

Table 3: Registers (continued)

ID	*Name*	*Body type*	*Reg of Members*	*Reg necessary to practice*	*Students on accredited courses*	*Reg of those with professional qual*	*De-registration*
34	Institute of Field Archeologists	PB	Yes	No	No	Yes	Yes
36	Institute of Food Science and Technology	PB	Yes	No	No	Yes	Yes
37	Institute of Horticulture	PB	Yes	No	No	Yes	Yes
41	Institute of Linguists	PB	Yes	No	No	Yes	Yes
47	Institution for Measurement and Control	PB	Yes	No	No	Yes	Yes
51	Institution of Electrical Engineers	PB	Yes	No	No	Yes	Yes
67	The Chartered Insurance Institute	PB[1]	Yes	No	No	Yes	Yes
11	Chartered Institute of Management Accountants	PB	Yes	No	No	Yes	No
14	Chartered Institute of Transport	PB	Yes	No	No	Yes	
33	Institute of Electronics and Electrical Incorporated Engineers	PB	Yes	No	No	Yes	
38	Institute of Information Scientists	PB	Yes	No	No	Yes	
18	College of Preceptors	PB	Yes	No	No	No	Yes
52	Institution of Mechanical Engineers	PB	Yes	No	No	No	Yes
53	Institution of Occupational Safety and Health	PB	Yes	No	No	No	Yes
68	The Geological Society	PB	Yes	No	NA	Yes	Yes
23	Gemmological Association and Gem Testing Laboratory of GB	PB[1]	Yes	No	NA	No	Yes
58	Royal College of Midwives	PB[2]	Yes	No	NA	NA	Yes
45	Institute of Quality Assurance	PB	Yes	No		Yes	
62	Royal Society of Chemistry	PB	Yes	Yes*	No	Yes	Yes
25	Institute of Animal Technology	PB	No	No	Yes	Yes	Yes
26	Institute of Biology	PB	No	No	Yes	Yes	Yes
65	Society of Chiropodists and Podiatrists	PB[1]	No	No	Yes	Yes	Yes
73	The Library Association	PB	No	No	Yes	Yes	Yes
56	Mathematical Association	PB	No	No	Yes	Yes	No
5	British Orthoptic Society	PB[2]	No	No	No	NA	Yes
91	Royal Economic Society	PA	No	No	No	NA	No
57	National Association of Goldsmiths of GB and Ireland	PB[1]	No	No	NA	Yes	Yes
81	National Board for Nursing, Midwifery & HVfor Scotland	RB	NA	Yes	Yes	Yes	Yes
84	UK Central Council for Nursing Midwifery and Health Visiting	RB	NA	Yes	Yes	Yes	Yes
85	Welsh National Board for Nursing Midwifery and Health Visiting	RB	NA	Yes	Yes	Yes	Yes
80	General Medical Council	RB	NA	Yes	Yes	NA	Yes
75	Architects Registration Council of the United Kingdom	RB	NA	Yes	No	Yes	Yes
78	English National Board for Nursing Midwifery and Health Visiting	RB	NA	Yes	No	Yes	Yes
79	General Dental Council	RB	NA	Yes	No	NA	Yes
83	The National Board for Nursing, Midwifery & HV for NI	RB	NA	Yes	No	NA	Yes
86	General Council and Register of Osteopaths Ltd	NSRB	NA	No	Yes	Yes	Yes
76	Central Council for Education and Training in Social Work	RB[1]	NA	No	Yes	Yes	No
87	General Council and Register of Naturopaths	NSRB	NA	No	Yes	NA	Yes
82	Teacher Training Agency	RB[1]	NA	No	No	NA	No
88	National Council for Drama Training	NSRB	NA	No	No	NA	No
92	National Council for the Training of Broadcast Journalists	VO	NA	No	No	NA	No
89	British Acupuncture Accreditation Board	NSRB	NA	No	No	NA	
77	Council for Professions Supplementary to Medicine	RB	NA	Yes*		NA	Yes
1	Association of Cost and Executive Accountants	PB					

PB professional body PB[1]=PB no work experience PB[2]=PB no professional qualification RB regulatory body RB[1]=RB no register Yes* in special cases

Table 4: Accreditation procedures

ID	*Name*	*Body type*	*Accredit HEIs*	*Formal accreditation*	*Subject specification*	*Professional qualification*
1	Association of Cost and Executive Accountants	PB	Yes	Yes	Yes	Yes
3	British Computer Society	PB	Yes	Yes	Yes	Yes
6	British Psychological Society	PB	Yes	Yes	Yes	Yes
7	Chartered Association of Certified Accountants	PB	Yes	Yes	Yes	Yes
8	Chartered Institute of Bankers in Scotland	PB	Yes	Yes	Yes	Yes
9	Chartered Institute of Building	PB	Yes	Yes	Yes	Yes
10	Chartered Institute of Housing	PB	Yes	Yes	Yes	Yes
11	Chartered Institute of Management Accountants	PB	Yes	Yes	Yes	Yes
13	Chartered Institute of Purchasing and Supply	PB	Yes	Yes	Yes	Yes
16	Chartered Society of Physiotherapy	PB	Yes	Yes	Yes	Yes
18	College of Preceptors	PB	Yes	Yes	Yes	Yes
19	College of Radiographers	PB	Yes	Yes	Yes	Yes
22	Confederation of Tourism, Hotel & Catering Management	PB	Yes	Yes	Yes	Yes
24	Hotel Catering and Institutional Management Association	PB	Yes	Yes	Yes	Yes
25	Institute of Animal Technology	PB	Yes	Yes	Yes	Yes
26	Institute of Biology	PB	Yes	Yes	Yes	Yes
27	Institute of Biomedical Science	PB	Yes	Yes	Yes	Yes
30	Institute of Chartered Accountants of Scotland	PB	Yes	Yes	Yes	Yes
31	Institute of Chartered Secretaries and Administrators	PB	Yes	Yes	Yes	Yes
34	Institute of Field Archeologists	PB	Yes	Yes	Yes	Yes
35	Institute of Financial Accountants	PB	Yes	Yes	Yes	Yes
40	Institute of Legal Executives	PB	Yes	Yes	Yes	Yes
41	Institute of Linguists	PB	Yes	Yes	Yes	Yes
42	Institute of Management	PB	Yes	Yes	Yes	Yes
44	Institute of Public Service Administrators	PB	Yes	Yes	Yes	Yes
47	Institution for Measurement and Control	PB	Yes	Yes	Yes	Yes
49	Institution of Chemical Engineers	PB	Yes	Yes	Yes	Yes
50	Institution of Civil Engineers	PB	Yes	Yes	Yes	Yes
51	Institution of Electrical Engineers	PB	Yes	Yes	Yes	Yes
52	Institution of Mechanical Engineers	PB	Yes	Yes	Yes	Yes
53	Institution of Occupational Safety and Health	PB	Yes	Yes	Yes	Yes
55	Law Society	PB	Yes	Yes	Yes	Yes
56	Mathematical Association	PB	Yes	Yes	Yes	Yes
62	Royal Society of Chemistry	PB	Yes	Yes	Yes	Yes
63	Royal Town Planning Institute	PB	Yes	Yes	Yes	Yes
64	Society and College of Radiographers	PB	Yes	Yes	Yes	Yes
66	The Chartered Institute of Bankers	PB	Yes	Yes	Yes	Yes
67	The Chartered Insurance Institute	PB[1]	Yes	Yes	Yes	Yes
70	The Institute of Physics	PB	Yes	Yes	Yes	Yes
73	The Library Association	PB	Yes	Yes	Yes	Yes
75	Architects Registration Council of the United Kingdom	RB	Yes	Yes	Yes	Yes
76	Central Council for Education and Training in Social Work	RB[1]	Yes	Yes	Yes	Yes
78	English National Board for Nursing Midwifery and HV	RB	Yes	Yes	Yes	Yes
81	National Board for Nursing, Midwifery & HV for Scotland	RB	Yes	Yes	Yes	Yes
85	Welsh National Board for Nursing Midwifery & HV	RB	Yes	Yes	Yes	Yes
86	General Council and Register of Osteopaths Ltd	NSRB	Yes	Yes	Yes	Yes
20	College of Speech and Language Therapists	PB[2]	Yes	Yes	Yes	No

Table 4: Accreditation procedures continued

ID	*Name*	*Body type*	*Accredit HEIs*	*Formal accreditation*	*Subject specification*	*Professional qualification*
59	Royal College of Nursing of the United Kingdom	PB[2]	Yes	Yes	Yes	No
77	Council for Professions Supplementary to Medicine	RB	Yes	Yes	Yes	No
80	General Medical Council	RB	Yes	Yes	Yes	No
87	General Council and Register of Naturopaths	NSRB	Yes	Yes	Yes	No
88	National Council for Drama Training	NSRB	Yes	Yes	Yes	No
89	British Acupuncture Accreditation Board	NSRB	Yes	Yes	Yes	No
90	Royal Society for the Promotion of Health	PA	Yes	Yes	Yes	No
38	Institute of Information Scientists	PB	Yes	Yes	No	Yes
54	Landscape Institute	PB	Yes	Yes	No	Yes
61	Royal Pharmaceutical Society of Great Britain	PB	Yes	Yes	No	Yes
65	Society of Chiropodists and Podiatrists	PB[1]	Yes	Yes	No	Yes
71	The Law Society of Northern Ireland	PB	Yes	Yes	No	Yes
74	The Royal Institution of Chartered Surveyors	PB	Yes	Yes	No	Yes
82	Teacher Training Agency	RB[1]	Yes	Yes	N A	No
33	Institute of Electronics & Electrical Incorporated Engineers	PB	Yes	Yes		Yes
46	Institute of Taxation Incorporated by Royal Charter	PB	Yes	Yes		Yes
12	Chartered Institute of Marketing	PB	Yes	No		Yes
14	Chartered Institute of Transport	PB	Yes	No		Yes
43	Institute of Personnel Management	PB	Yes	No		Yes
15	Chartered Society of Designers	PB	Yes	INA	Yes	Yes
21	Community and Youth Work Association	PB	Yes	INA	Yes	Yes
48	Institution of Chartered Accountants in England and Wales	PB	Yes	INA	Yes	Yes
91	Royal Economic Society	PA	Yes	INA	N A	No
39	Institute of Internal Auditors	PB	Yes	INA		Yes
45	Institute of Quality Assurance	PB	Yes	INA		Yes
4	British Dietetic Association	PB[2]	Yes	INA		No
92	National Council for the Training of Broadcast Journalists	VO	Yes	INA		No
29	Institute of Chartered Accountants in Ireland	PB	No	N A	Yes	Yes
2	British College of Optometrists	PB	No	N A	N A	Yes
28	Institute of Business Administration	PB	No	N A	N A	Yes
32	Institute of Chiropodists	PB	No	N A	N A	Yes
36	Institute of Food Science and Technology	PB	No	N A	N A	Yes
37	Institute of Horticulture	PB	No	N A	N A	Yes
57	National Association of Goldsmiths of GB and Ireland	PB[1]	No	N A	N A	Yes
60	Royal Institute of Public Health and Hygiene	PB	No	N A	N A	Yes
84	UK Central Council for Nursing Midwifery and HV	RB	No	N A	N A	Yes
5	British Orthoptic Society	PB[2]	No	N A	N A	No
17	College of Occupational Therapists	PB[2]	No	N A	N A	No
58	Royal College of Midwives	PB[2]	No	N A	N A	No
72	The Law Society of Scotland	PB[2]	No	N A	N A	No
79	General Dental Council	RB	No	N A	N A	No
83	The National Board for Nursing, Midwifery & HV for NI	RB	No	N A	N A	No
68	The Geological Society	PB	No	NA	NA	Yes
23	Gemmological Association & Gem Testing Lab of GB	PB[1]	No	NA	NA	Yes
69	The Institute of Export	PB[1]	No	NA	NA	Yes

PB professional body PB[1]=PB no work experience PB[2]=PB no professional qualification RB regulatory body RB[1]=RB no register NA not applicable INA information not available

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Table 5: Course validation procedures

ID	*Name*	*Type of body*	*Validate courses*	*Attend IVEs*	*Periodic vsits*	*Postal validation*	*Prof qualification*
7	Chartered Association of Certified Accountants	PB	Yes	Yes	Yes	Yes	Yes
27	Institute of Biomedical Science	PB	Yes	Yes	Yes	Yes	Yes
43	Institute of Personnel Management	PB	Yes	Yes	Yes	Yes	Yes
55	Law Society	PB	Yes	Yes	Yes	Yes	Yes
62	Royal Society of Chemistry	PB	Yes	Yes	Yes	Yes	Yes
66	The Chartered Institute of Bankers	PB	Yes	Yes	Yes	Yes	Yes
89	British Acupuncture Accreditation Board	NSRB	Yes	Yes	Yes	Yes	No
6	British Psychological Society	PB	Yes	No	Yes	Yes	Yes
8	Chartered Institute of Bankers in Scotland	PB	Yes	No	Yes	Yes	Yes
16	Chartered Society of Physiotherapy	PB	Yes	No	Yes	Yes	Yes
18	College of Preceptors	PB	Yes	No	Yes	Yes	Yes
19	College of Radiographers	PB	Yes	No	Yes	Yes	Yes
21	Community and Youth Work Association	PB	Yes	No	Yes	Yes	Yes
28	Institute of Business Administration	PB	Yes	No	Yes	Yes	Yes
42	Institute of Management	PB	Yes	No	Yes	Yes	Yes
56	Mathematical Association	PB	Yes	No	Yes	Yes	Yes
64	Society and College of Radiographers	PB	Yes	No	Yes	Yes	Yes
65	Society of Chiropodists and Podiatrists	PB[1]	Yes	No	Yes	Yes	Yes
73	The Library Association	PB	Yes	No	Yes	Yes	Yes
76	Central Council for Education and Training in Social Work	RB[1]	Yes	No	Yes	Yes	Yes
78	English National Board for Nursing Midwifery and HV	RB	Yes	No	Yes	Yes	Yes
81	National Board for Nursing, Midwifery & HV for Scotland	RB	Yes	No	Yes	Yes	Yes
85	Welsh National Board for Nursing Midwifery & HV	RB	Yes	No	Yes	Yes	Yes
17	College of Occupational Therapists	PB[2]	Yes	No	Yes	Yes	No
20	College of Speech and Language Therapists	PB[2]	Yes	No	Yes	Yes	No
58	Royal College of Midwives	PB[2]	Yes	No	Yes	Yes	No
59	Royal College of Nursing of the United Kingdom	PB[2]	Yes	No	Yes	Yes	No
77	Council for Professions Supplementary to Medicine	RB	Yes	No	Yes	Yes	No
83	The National Board for Nursing, Midwifery & HV for NI	RB	Yes	No	Yes	Yes	No
87	General Council and Register of Naturopaths	NSRB	Yes	No	Yes	Yes	No
14	Chartered Institute of Transport	PB	Yes	No	No	Yes	Yes
24	Hotel Catering and Institutional Management Association	PB	Yes	No	No	Yes	Yes
26	Institute of Biology	PB	Yes	No	No	Yes	Yes
31	Institute of Chartered Secretaries and Administrators	PB	Yes	No	No	Yes	Yes
46	Institute of Taxation Incorporated by Royal Charter	PB	Yes	No	No	Yes	Yes
63	Royal Town Planning Institute	PB	Yes	No	No	Yes	Yes
39	Institute of Internal Auditors	PB	Yes	Yes	Yes	No	Yes
40	Institute of Legal Executives	PB	Yes	Yes	Yes	No	Yes
80	General Medical Council	RB	Yes	Yes	Yes	No	No
10	Chartered Institute of Housing	PB	Yes	No	Yes	No	Yes
13	Chartered Institute of Purchasing and Supply	PB	Yes	No	Yes	No	Yes
53	Institution of Occupational Safety and Health	PB	Yes	No	Yes	No	Yes
75	Architects Registration Council of the United Kingdom	RB	Yes	No	Yes	No	Yes
79	General Dental Council	RB	Yes	No	Yes	No	No
88	National Council for Drama Training	NSRB	Yes	No	Yes	No	No
92	National Council for the Training of Broadcast Journalists	VO	Yes	No	Yes	No	No

Table 5: Course validation procedures (continued)

ID	*Name*	*Type of body*	*Validate courses*	*Attend IVEs*	*Periodic visits*	*Postal validation*	*Prof. qualification*
1	Association of Cost and Executive Accountants	PB	Yes	Yes	No	No	Yes
60	Royal Institute of Public Health and Hygiene	PB	Yes	Yes	No	No	Yes
22	Confederation of Tourism, Hotel & Catering Management	PB	Yes	No	No	No	Yes
41	Institute of Linguists	PB	Yes	No	No	No	Yes
67	The Chartered Insurance Institute	PB[1]	Yes	No	No	No	Yes
2	British College of Optometrists	PB	No	NA	NA	NA	Yes
3	British Computer Society	PB	No	NA	NA	NA	Yes
9	Chartered Institute of Building	PB	No	NA	NA	NA	Yes
11	Chartered Institute of Management Accountants	PB	No	NA	NA	NA	Yes
12	Chartered Institute of Marketing	PB	No	NA	NA	NA	Yes
15	Chartered Society of Designers	PB	No	NA	NA	NA	Yes
23	Gemmological Association & Gem Testing Lab of GB	PB[1]	No	NA	NA	NA	Yes
25	Institute of Animal Technology	PB	No	NA	NA	NA	Yes
29	Institute of Chartered Accountants in Ireland	PB	No	NA	NA	NA	Yes
30	Institute of Chartered Accountants of Scotland	PB	No	NA	NA	NA	Yes
32	Institute of Chiropodists	PB	No	NA	NA	NA	Yes
33	Institute of Electronics & Electrical Incorporated Engineers	PB	No	NA	NA	NA	Yes
34	Institute of Field Archeologists	PB	No	NA	NA	NA	Yes
35	Institute of Financial Accountants	PB	No	NA	NA	NA	Yes
36	Institute of Food Science and Technology	PB	No	NA	NA	NA	Yes
37	Institute of Horticulture	PB	No	NA	NA	NA	Yes
38	Institute of Information Scientists	PB	No	NA	NA	NA	Yes
44	Institute of Public Service Administrators	PB	No	NA	NA	NA	Yes
45	Institute of Quality Assurance	PB	No	NA	NA	NA	Yes
47	Institution for Measurement and Control	PB	No	NA	NA	NA	Yes
48	Institution of Chartered Accountants in England and Wales	PB	No	NA	NA	NA	Yes
49	Institution of Chemical Engineers	PB	No	NA	NA	NA	Yes
50	Institution of Civil Engineers	PB	No	NA	NA	NA	Yes
51	Institution of Electrical Engineers	PB	No	NA	NA	NA	Yes
52	Institution of Mechanical Engineers	PB	No	NA	NA	NA	Yes
54	Landscape Institute	PB	No	NA	NA	NA	Yes
57	National Association of Goldsmiths of GB and Ireland	PB[1]	No	NA	NA	NA	Yes
61	Royal Pharmaceutical Society of Great Britain	PB	No	NA	NA	NA	Yes
68	The Geological Society	PB	No	NA	NA	NA	Yes
70	The Institute of Physics	PB	No	NA	NA	NA	Yes
71	The Law Society of Northern Ireland	PB	No	NA	NA	NA	Yes
74	The Royal Institution of Chartered Surveyors	PB	No	NA	NA	NA	Yes
84	UK Central Council for Nursing Midwifery and HV	RB	No	NA	NA	NA	Yes
86	General Council and Register of Osteopaths Ltd	NSRB	No	NA	NA	NA	Yes
5	British Orthoptic Society	PB[2]	No	NA	NA	NA	No
72	The Law Society of Scotland	PB[2]	No	NA	NA	NA	No
82	Teacher Training Agency	RB[1]	No	NA	NA	NA	No
90	Royal Society for the Promotion of Health	PA	No	NA	NA	NA	No
91	Royal Economic Society	PA	No	NA	NA	NA	No
69	The Institute of Export	PB[1]	ISC	Yes	No	No	Yes
4	British Dietetic Association	PB[2]	Yes*		No	No	No

PB professional body PB[1]=PB no work experience PB[2]=PB no professional qualification RB regulatory body RB[1]=RB no register Yes* In special cases NA not applicable

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Table 6: Curriculum

ID	*Name*	*Body type*	*Profes-sional qualif-ication*	*Chart-ered status*	*Direct input into curri-culum*	*Influ-ence curri-culum*
6	British Psychological Society	PB	Yes	Yes	Yes	Yes
7	Chartered Association of Certified Accountants	PB	Yes	Yes	Yes	Yes
10	Chartered Institute of Housing	PB	Yes	Yes	Yes	Yes
14	Chartered Institute of Transport	PB	Yes	Yes	Yes	Yes
15	Chartered Society of Designers	PB	Yes	Yes	Yes	Yes
16	Chartered Society of Physiotherapy	PB	Yes	Yes	Yes	Yes
18	College of Preceptors	PB	Yes	Yes	Yes	Yes
30	Institute of Chartered Accountants of Scotland	PB	Yes	Yes	Yes	Yes
31	Institute of Chartered Secretaries and Administrators	PB	Yes	Yes	Yes	Yes
46	Institute of Taxation Incorporated by Royal Charter	PB	Yes	Yes	Yes	Yes
49	Institution of Chemical Engineers	PB	Yes	Yes	Yes	Yes
50	Institution of Civil Engineers	PB	Yes	Yes	Yes	Yes
51	Institution of Electrical Engineers	PB	Yes	Yes	Yes	Yes
55	Law Society	PB	Yes	Yes	Yes	Yes
62	Royal Society of Chemistry	PB	Yes	Yes	Yes	Yes
73	The Library Association	PB	Yes	Yes	Yes	Yes
8	Chartered Institute of Bankers in Scotland	PB	Yes	No	Yes	Yes
13	Chartered Institute of Purchasing and Supply	PB	Yes	No	Yes	Yes
19	College of Radiographers	PB	Yes	No	Yes	Yes
21	Community and Youth Work Association	PB	Yes	No	Yes	Yes
25	Institute of Animal Technology	PB	Yes	No	Yes	Yes
28	Institute of Business Administration	PB	Yes	No	Yes	Yes
39	Institute of Internal Auditors	PB	Yes	No	Yes	Yes
40	Institute of Legal Executives	PB	Yes	No	Yes	Yes
42	Institute of Management	PB	Yes	No	Yes	Yes
43	Institute of Personnel Management	PB	Yes	No	Yes	Yes
53	Institution of Occupational Safety and Health	PB	Yes	No	Yes	Yes
64	Society and College of Radiographers	PB	Yes	No	Yes	Yes
66	The Chartered Institute of Bankers	PB	Yes	No	Yes	Yes
76	Central Council for Education and Training in Social Work	RB[1]	Yes	No	Yes	Yes
78	English National Board for Nursing Midwifery and Health Visiting	RB	Yes	No	Yes	Yes
84	UK Central Council for Nursing Midwifery and Health Visiting	RB	Yes	No	Yes	Yes
1	Association of Cost and Executive Accountants	PB	Yes		Yes	Yes
5	British Orthoptic Society	PB[2]	No	No	Yes	Yes
17	College of Occupational Therapists	PB[2]	No	No	Yes	Yes
58	Royal College of Midwives	PB[2]	No	No	Yes	Yes
59	Royal College of Nursing of the United Kingdom	PB[2]	No	No	Yes	Yes
79	General Dental Council	RB	No	No	Yes	Yes
87	General Council and Register of Naturopaths	NSRB	No	No	Yes	Yes
89	British Acupuncture Accreditation Board	NSRB	No	No	Yes	Yes
77	Council for Professions Supplementary to Medicine	RB		No	Yes	Yes
80	General Medical Council	RB		No	Yes	Yes
3	British Computer Society	PB	Yes	Yes	No	Yes
9	Chartered Institute of Building	PB	Yes	Yes	No	Yes
12	Chartered Institute of Marketing	PB	Yes	Yes	No	Yes
26	Institute of Biology	PB	Yes	Yes	No	Yes
29	Institute of Chartered Accountants in Ireland	PB	Yes	Yes	No	Yes
47	Institution for Measurement and Control	PB	Yes	Yes	No	Yes
48	Institution of Chartered Accountants in England and Wales	PB	Yes	Yes	No	Yes
52	Institution of Mechanical Engineers	PB	Yes	Yes	No	Yes

Table 6: Curriculum (continued)

ID	*Name*	*Body type*	*Profes-sional qualif-icat-ion*	*Chart-ered status*	*Direct input into curri-culum*	*Influ-ence curri-culum*
61	Royal Pharmaceutical Society of Great Britain	PB	Yes	Yes	No	Yes
63	Royal Town Planning Institute	PB	Yes	Yes	No	Yes
67	The Chartered Insurance Institute	PB[1]	Yes	Yes	No	Yes
68	The Geological Society	PB	Yes	Yes	No	Yes
63	Royal Town Planning Institute	PB	Yes	Yes	No	Yes
67	The Chartered Insurance Institute	PB[1]	Yes	Yes	No	Yes
68	The Geological Society	PB	Yes	Yes	No	Yes
70	The Institute of Physics	PB	Yes	Yes	No	Yes
74	The Royal Institution of Chartered Surveyors	PB	Yes	Yes	No	Yes
22	Confederation of Tourism, Hotel and Catering Management	PB	Yes	No	No	Yes
24	Hotel Catering and Institutional Management Association	PB	Yes	No	No	Yes
27	Institute of Biomedical Science	PB	Yes	No	No	Yes
33	Institute of Electronics and Electrical Incorporated Engineers	PB	Yes	No	No	Yes
34	Institute of Field Archeologists	PB	Yes	No	No	Yes
36	Institute of Food Science and Technology	PB	Yes	No	No	Yes
37	Institute of Horticulture	PB	Yes	No	No	Yes
38	Institute of Information Scientists	PB	Yes	No	No	Yes
54	Landscape Institute	PB	Yes	No	No	Yes
56	Mathematical Association	PB	Yes	No	No	Yes
60	Royal Institute of Public Health and Hygiene	PB	Yes	No	No	Yes
65	Society of Chiropodists and Podiatrists	PB[1]	Yes	No	No	Yes
69	The Institute of Export	PB[1]	Yes	No	No	Yes
71	The Law Society of Northern Ireland	PB	Yes	No	No	Yes
75	Architects Registration Council of the United Kingdom	RB	Yes	No	No	Yes
81	National Board for Nursing, Midwifery and HV for Scotland	RB	Yes	No	No	Yes
85	Welsh National Board for Nursing Midwifery and Health Visiting	RB	Yes	No	No	Yes
86	General Council and Register of Osteopaths Ltd	NSRB	Yes	No	No	Yes
20	College of Speech and Language Therapists	PB[2]	No	No	No	Yes
72	The Law Society of Scotland	PB[2]	No	No	No	Yes
88	National Council for Drama Training	NSRB	No	No	No	Yes
90	Royal Society for the Promotion of Health	PA	No	No	No	Yes
91	Royal Economic Society	PA	No	No	No	Yes
92	National Council for the Training of Broadcast Journalists	VO	No	No	No	Yes
83	The National Board for Nursing, Midwifery and HV for NI	RB		No	No	Yes
11	Chartered Institute of Management Accountants	PB	Yes	Yes	No	No
2	British College of Optometrists	PB	Yes	No	No	No
23	Gemmological Association and Gem Testing Laboratory of GB	PB[1]	Yes	No	No	No
32	Institute of Chiropodists	PB	Yes	No	No	No
35	Institute of Financial Accountants	PB	Yes	No	No	No
41	Institute of Linguists	PB	Yes	No	No	No
44	Institute of Public Service Administrators	PB	Yes	No	No	No
45	Institute of Quality Assurance	PB	Yes	No	No	No
57	National Association of Goldsmiths of GB and Ireland	PB[1]	Yes	No	No	No
82	Teacher Training Agency	RB[1]	No	No	No	No
4	British Dietetic Association	PB[2]	No	No		

PB professional body PB[1]=PB no work experience PB[2]=PB no professional qualification RB regulatory body RB[1]=RB no register

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Appendix 3

A brief outline of a top-down, bottom-up model of external quality monitoring

An effective model would be one that develops a quality culture of continuous improvement. Such a model shifts the primary emphasis on quality from external scrutiny to internal effective action. In terms of teaching and learning, for example, this means devising a quality system that drives improvement from the *staff-student interface*. However, accountability is ensured through external quality monitoring, which audits the quality activities of effective teams, in much the same way that the financial accounts are audited.

The proposal is clearly distinct from external assessment controlled from outside the institution and from audit of quality assurance procedures. The model emphasises internally-driven quality improvement and external monitoring would assess the legitimacy of the improvement claims, while simultaneously reviewing standards. In short, the external monitoring would audit the claims about quality and standards that are annually codified in examiners' reports, course reports and so on.

The top-down monitoring would operate in principle, in a similar way to the audit of the financial accounts. Instead of statements of account, the institution would need to provided a set of layered accounts of quality and standards, along with supporting evidence. [1]

An effective, streamlined approach would require the institution bringing together the appropriate accounts and improvement agendas into an institutional report, by course or subject area, including its own overview of quality improvement and standards issues.

The audit may require some close checking to authenticate the claims, and this may involve direct observation of the teaching and learning process, examination of available resources, assessment criteria and so on.

The proposed model of a top-down process of scrutiny and accountability with a bottom-up process of continuous quality improvement, most effectively uses external quality monitoring to *improve* the student experience, the professionalism of managers or the research process.

The team

A bottom-up approach to quality improvement requires identifiable teams of academics working together to identify quality targets, setting agendas for action and reporting clearly on intentions and outcomes. The nature and constitution of such teams will vary depending on the type of institution. However, effective functioning for quality-improvement will require that the teams consist of people with a common focus and responsibilities. Teams must relate to recognised areas of activity and be able to act as coherent working groups. Team decisions should involve everyone and not be made by managers or team leaders.

The corrolory of this is that the team must accept responsibility for continuous quality improvement within its domain. This involves a number of specific team responsibilities including:

- identification of its *area of operation* and the specific aspects of quality that it will monitor: these may relate to teaching and learning, curriculum content, research, external employer-relations, and so on;
- specification of appropriate mechanisms for *assessing and maintaining standards* and procedures for action in the case of inappropriate standards;
- identification and implementation of *procedures for monitoring quality*, such as the facilitated student feedback about their learning experience. All such procedures must be made explicit and transparent;

- identification of *procedures for improving quality*, such as review and updating of curriculum content and design, staff development and training, staff-student seminars, and so on. In many circumstances, procedures will already exist that can be adopted or easily adapted to fit the proposed approach;
- ensuring that its procedures and improvements are set in the context of a *local self-critical review and strategic plan*. Such a plan will be constrained by the parameters of institutional strategic planning but, within that, should identify longer term goals and, more importantly, one-year, attainable, quality improvements.

The fifth responsibility is central to an effective process of continuous quality improvement as it provides the mechanism for ensuring transparency, closing the quality loop, and ensuring appropriate action.

A useful mechanism for doing this is an annual report. Many institutions curently expect academics working on a programme of study to provide an annual review. While this is laudable, these reports are normally retrospective and produced by a programme director rather than a co-operating team. The type of review envisaged in the model is one that is predominatly prospective, setting a clear agenda for action. It would also clearly identify how the previous quality-improvement agenda had been fulfilled. [2]

Codifying intentions and outcomes through a quality-improvement report places the *ownership and control* of quality improvement in the hands of the people who are going to effect changes at the staff-student interface, the course development level, the research frontline, and so on. Simultaneously, it places an obligation on the team to systematically address the agenda they set for themselves.

Auditing quality improvement

Although quality improvement is driven from the bottom-up it must be based on a responsive, outward-looking review and appraisal of what is provided. The quality-improvement agenda must take into account a range of concerns and different stakeholder perspectives in an open, self-critical manner. It is of no use as a quality improvement tool if it simply looks inwards and is written as a self-congratulatory document.

How can this be achieved? In part it can be achieved through an appeal to professionalism embedded in the process of delegated responsibility and team control of the quality process.

A second way to ensure that the report is meaningful is for it to be subject to review and discussion by those to whom the report directly refers. For example, a report by a course team should be open to commentary by students and by faculty managers. A report by a faculty management group should be scrutined by teaching staff and by senior managers, and so on.

A third approach is to adopt a process of external monitoring and checks through an audit system. Each quality report produced by a team should be audited internally by the institution on an annual basis. The internal audit should also result in an institutional quality report. The single-volume institutional report should be a compilation of the team quality reports added to which is its own self-critical analysis of its institution-wide quality assurance procedures. This report should be subject to external audit on a periodic basis.

Internal audit

To ensure confidence in the process, internal audits should be undertaken by relatively independent unit reporting directly to the (pro-) vice-chancellor or to senate. If the report is to be a keystone in the process of continuous quality improvement then it is essential that the outputs are not linked in any direct way to internal funding allocations. If funding is linked there will be little liklihood of self-critical analysis.

To verify the report's conclusions, the internal auditors would probably:

- require clarification of claims made in the report;
- require evidence of unsupported claims;
- undertake an audit trail of the way the quality assurance process operates;
- observe teaching;
- examine output from scholarship and research activities;
- talk to students and other stakeholders.

Internal audits may take place on a periodic basis or at random.

An important feature of the audit should be to collect and disseminate good practice through thorough debriefing sessions. Audit procedures might also be used to suggest, where appropriate, suitable staff-development opportunities.

External audit

External audit procedures would need to restrict itself to auditing the documentation produced on a regular basis by the institution rather than expect special documents to be produced to order. Institutional documentation might reasonably be expected to include an annual institutional report that fully covers quality-improvement initiatives and outcomes. The full institutional report should be published, or at least lodged with an external independent body, on an annual basis.

The external auditors could comment on the institutional quality report and undertake a more detailed audit on a periodic basis. The detailed audit, probably using peer review, would assess the validity of selected team reports and the effectiveness of the internal audit process. The overall aim of external audit, within this top-down, bottom-up framework, would be to assess whether institutions are fulfilling their mission, provide feedback on how this might be better accomplished and possibly suggest modifications to the mission in the light of changed national circumstances or local requirements.

A single external auditing agency would be required, which took account of professional body and employer interests where appropriate. There would be very little need for any ongoing audit of institution-wide quality mechanisms alongside the detailed course/subject-area audits as the latter should clearly indicate audit trails and effective action based on student, staff and external stakeholder views.

ENDNOTES

1 In such a process institutional management does not direct or manage quality but provides a context to facilitate quality improvement, in particular, the dissemination of good practice and the delegation of responsibility for quality .

2 This approach has been linked to the emergence of 'new collegialism' and elaborated in other publications (Harvey, 1994, 1995). A suggested structure for the content of the report might include the following.

- Setting out *long-term goals* (and indicate how these have changed from previous reports);
- Identifying *areas of action* for the forthcoming year;
- *Reviewing* the previous year's plan of action;
- *Evaluating changes* that have been introduced;
- Reporting on the *quality* of what is provided by the team;
- Commenting on *student evaluations* and those of other relevant stakeholders
- Indicating what will be *done* to address stakeholder views;
- Identifying actual and proposed *changes to procedures* for monitoring and improving quality;
- *Assessing* the suitability of the *research profile* (where appropriate) and the way teaching relates to research;
- *Assessing* the *teaching and learning process*;
- *Assessing* the level and range of *student attainment* (Harvey, 1994b).

Appendix 4

Table 1

Quality	Definition	Standards Definition Academic standards	Standards of competence	Service standards
		The demonstrated ability to meet specified level of academic attainment. For pedagogy, the ability of students to be able to do those things designated as appropriate at a given level of education. Usually, the measured competence of an individual in attaining specified (or implied) course aims and objectives, operationalised via performance on assessed pieces of work. For research, the ability to undertake effective scholarship or produce new knowledge, which is assessed via peer recognition.	Demonstration that a specified level of ability on a range of competencies has been achieved. Competencies may include general transferable skills required by employers; academic ('higher level') skills implicit or explicit in the attainment of degree status or in a post-graduation academic apprenticeship; particular abilities congruent with induction into a profession.	Are measures devised to assess identified elements of the service provided against specified benchmarks. Elements assessed include activities of service providers and facilities within which the service takes place. Benchmarks specified in 'contracts' such as student charters tend to be quantified and restricted to measurable items. *Post hoc* measurement of customer opinions (satisfaction) are used as indicators of service provision. Thus, service standards in higher education parallel consumer standards.
Exceptional	A traditional concept linked to the idea of 'excellence', usually operationalised as exceptionally high standards of academic achievement. Quality is achieved if the standards are surpassed.	Emphasis on summative assessment of knowledge and, implicitly, some 'higher-level' skills. Implicit normative gold-standard. Comparative evaluation of research output. Élitism: the presupposition of a need to maintain pockets of high quality and standards in a mass education system.	Linked to professional competence; emphasis mainly on traditional demarcation between knowledge and (professional) skills.	Input-driven assumptions of resource-linked service/facilities. Good facilities, well-qualified staff, etc. 'guarantee' service standards. Reluctance to expose professional (teaching) competence to scrutiny.
Perfection or consistency	Focuses on process and sets specifications that it aims to meet. Quality in this sense is summed up by the interrelated ideas of zero defects and getting things right first time.	Meaningless, except for an idealistic notion that peer scrutiny of standards or quality will be undertaken in a consistent manner.	Expectation of a minimum prescribed level of professional competence. Problem in assessing for 'zero defects'.	Primary relevance in ensuring service-standard based quality—mainly in relation to administrative processes (accuracy and reliability of record keeping, timetables, coursework arrangements, etc.)
Fitness for purpose	Judges quality in terms of the extent to which a product or service meets its stated purpose. The purpose may be customer-defined to meet requirements or (in education) institution-defined to reflect institutional mission (or course objectives).	Theoretically, standards should relate to the defined objectives that relate to the purpose of the course (or institution). Summative assessment should be criteria referenced, although as purposes often include a comparative element (e.g., in mission statement) these are mediated by norm-referenced criteria.	Explicit specification of skills and abilities related to objectives. Evidence required to at least identify threshold standards. Professional competence primarily assessed in terms of threshold minimums against professional body requirements for practice.	The purpose involves the provision of a service. Thus, process is assessed in terms of (minimum) standards for the purpose—usually in terms of teaching competence, the link between teaching and research, student support (academic and non-academic) and so on.
Value for money	Assesses quality in terms of return on investment or expenditure. At the heart of the value-for-money approach in education is the notion of accountability. Public services, including education, are expected to be accountable to the funders. Increasingly, students are also considering their own investment in higher education in value-for-money terms.	Maintenance or improvement of academic outcomes (graduate standards and research output) for the same (or declining) unit of resource. That is, ensure greater efficiency. Similarly, improve the process-experience of students. Concern that efficiency gains work in the opposite direction to quality improvement. Provide students with an academic experience (qualification, training, personal development) to warrant the investment.	Maintain or improve the output of generally 'employable' graduates for the same unit of resource. Similarly, ensure a continual or increasing supply of recruits to post-graduation professional bodies. Provide students with an educational experience that increases competence, in relation to career advancement, which ensures a return on investment.	Customer satisfaction analyses (student, employers, funding bodies) to assess process and outcomes. Students and other stakeholders are seen as 'paying customers'. Customer charters specify minimum levels of service (and facilities) that students (parents, employers) can expect.
Transform-ation	Sees quality as a process of change, which in higher education adds value to students through their learning experience. Education is not a service for a customer but an ongoing process of transformation of the participant. This leads to two notions of transformative quality in education: enhancing the consumer and empowering the consumer.	Assessment of students in terms of the standard of acquisition of transformative knowledge and skills (analysis, critique, synthesis, innovation)against explicit objectives. Focus on adding value rather than gold standards. As transformation involves empowerment, formative as well as summative assessment is required. Transformative research standards are assessed in terms of *impact* in relation to objectives.	Provide students with enhanced skills and abilities that empower them to continue learning and to engage effectively with the complexities of the 'outside' world. Assessment of students in terms of the acquisition of transformative skills (analysis, critique, synthesis, innovation) and the transformative impact they have post-graduation.	Emphasis on specification and assessment of standards of service and facilities that enable the process of student learning *and* the acquisition of transformative abilities.

Source: *Quality in Higher Education*, 1, no. 1, p. 11

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